NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Federally Enforceable State Operating Permit (FESOP)

for Whitewater Mill, LLC in Dearborn County

Significant Permit Revision No.: 029-43348-00045

The Indiana Department of Environmental Management (IDEM) has received an application from Whitewater Mill, LLC, located at 707 Harrison Brookville Road, West Harrison, Indiana 47060, for a significant revision of its FESOP issued on July 8, 2019. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow Whitewater Mill, LLC to make certain changes at its existing source. Whitewater Mill, LLC has applied to adjust FESOP limits due to typographical errors in the permit.

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

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

North Dearborn Branch Library
25969 Dole Road
West Harrison, Indiana 47060

and

IDEM Southeast Regional Office
820 West Sweet Street
Brownstown, IN 47220-9557

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 SPR 029-43348-00045 in all correspondence.

Comments should be sent to:

L. David Cohen  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for L. David Cohen or (317) 233-9327  
Or dial directly: (317) 233-9327  
Fax: (317) 232-6749 attn: L. David Cohen  
E-mail: LCohen@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](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](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, the IDEM Regional Office 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 L. David Cohen of my staff at the above address.

Madhurima D. Moulik, Ph.D., Section Chief  
Permits Branch  
Office of Air Quality
Mr. John Lumpkin  
Whitewater Mill, LLC  
707 Harrison Brookville Road  
West Harrison, Indiana 47060  

Re: 029-43348-00045  
Significant Revision to  
F029-40814-00045

Dear Mr. Lumpkin,

Whitewater Mill, LLC was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F029-40814-00045, on July 8, 2019, for a stationary wheat mill located at 707 Harrison Brookville Road, West Harrison, Indiana 47060. On October 3, 2020, the Office of Air Quality (OAQ) received an application from the source requesting changes to typographical errors in the permit that resulted to changes in FESOP minor limits. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised. The permit references the below-listed attachment(s). Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this revision:

Attachment A: 40 CFR 60, Subpart DD, Grain Elevators

Previously issued approvals for this source containing this attachment are available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/).

Previously issued approvals for this source are also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: [http://www.in.gov/idem/](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.


A copy of the permit is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/). A copy of the application and permit is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: [http://www.in.gov/idem/](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. 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](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](http://www.in.gov/idem/6900.htm).

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions regarding this matter, please contact L. David Cohen, 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) 233-9327 or (800) 451-6027, and ask for L. David Cohen or (317) 233-9327.

Sincerely,

Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Dearborn County
Dearborn County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Southeast Regional Office
Federally Enforceable State Operating Permit Renewal

OFFICE OF AIR QUALITY

DRAFT

Whitewater Mill, LLC
707 Harrison Brookville Road
West Harrison, Indiana 47060

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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 FESOP under 326 IAC 2-8.

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FESOP Significant Permit Revision No.: 029-42226-00045, issued on March 9, 2020.

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SECTION A  SOURCE SUMMARY

A.1 General Information [326 IAC 2-8-3(b)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]
A.4 FESOP Applicability  [326 IAC 2-8-2]

SECTION B  GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
B.3 Term of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]
B.5 Severability [326 IAC 2-8-4(4)]
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
B.10 Compliance Order Issuance  [326 IAC 2-8-5(b)]
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]
B.12 Emergency Provisions [326 IAC 2-8-12]
B.13 Prior Permits Superseded  [326 IAC 2-1.1-9.5]
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
B.16 Permit Renewal [326 IAC 2-8-3(h)]
B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
B.19 Source Modification Requirement [326 IAC 2-8-11.1]
B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
B.22 Annual Fee Payment [326 IAC 2-8-19][326 IAC 2-8-4(6)]
[326 IAC 2-8-16][326 IAC 2-1.1-7]
B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

SECTION C  SOURCE OPERATION CONDITIONS

Emission Limitations and Standards  [326 IAC 2-8-4(1)] ................................................................. 19
C.1 Overall Source Limit [326 IAC 2-8]
C.2 Opacity  [326 IAC 5-1]
C.3 Open Burning  [326 IAC 4-1][IC 13-17-9]
C.4 Incineration  [326 IAC 4-2][326 IAC 9-1-2]
C.5 Fugitive Dust Emissions  [326 IAC 6-4]
C.6 Asbestos Abatement Projects  [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-8-4(3)] .................................................................................... 21
C.7 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11] .................................................................................. 21
C.8 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements  [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)] ......................... 21
C.9 Compliance Monitoring  [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
C.10 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps  [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)] ......................... 22
C.11 Emergency Reduction Plans  [326 IAC 1-5-2][326 IAC 1-5-3]
C.12 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]
C.13 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]
C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] ......................................... 23
C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection ................................................................................................. 24
C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS ...................................................... 25
D.1.1 PM, PM10 and PM2.5 PSD Minor Limits and FESOP Limits [326 IAC 2-8-4] [326
IAC 2-2]
D.1.2 Particulate Emission Limits [326 IAC 6.5-1-2]
D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements [326 IAC 2-8-4(1)] ................................................ 32
D.1.4 Particulate Control
D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)] ........................ 33
D.1.6 Visible Emissions Notations
D.1.7 Parametric Monitoring
D.1.8 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] ........................................ 34
D.1.9 Record Keeping Requirements
D.1.9 Reporting Requirements

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS ...................................................... 36
Emission Limitations and Standards [326 IAC 2-8-4(1)] .......................................................... 36
D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]
D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(1)]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] ........................................ 37
D.2.4 Record Keeping Requirements

SECTION E.1 NSPS .................................................................................................................. 38
New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4(1)] ............... 39
E.1.1 General Provisions Relating to New Source Performance Standards
[326 IAC 12-1] [40 CFR Part 60, Subpart A]
E.1.2 Grain Elevators NSPS [326 IAC 12] [40 CFR Part 60, Subpart DD]
E.1.3 Testing Requirements [326 IAC 2-1.1-11]

CERTIFICATION ...................................................................................................................... 41
EMERGENCY OCCURRENCE REPORT .................................................................................. 42
FESOP Quarterly Report .......................................................................................................... 44
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT ............................ 45
Attachment A - Grain Elevators NSPS, Subpart DD
### SECTION A  SOURCE SUMMARY

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

#### A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wheat mill.

| Source Address: | 707 Harrison Brookville Road, West Harrison, Indiana 47060 |
| General Source Phone Number: | 217.857.2238 |
| SIC Code: | 2041 |
| County Location: | Dearborn Outside Lawrenceburg Township |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit Program Major Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- **(a)** Whole Grain Receiving, Handling, Pre-Cleaning, and Storage Operations, identified as emission unit AUMF-60787, constructed in 2014, having a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and consisting of the following:

  1. **(1)** Whole Grain Receiving, with a maximum throughput capacity of 550 tons of raw wheat per hour, controlled by one (1) baghouse, identified as Filter #01, exhausting to stack S1, and including:

     - **(A)** One (1) partially enclosed truck unloading area; and
     - **(i)** Intake hopper(s); and
     - **(ii)** Enclosed conveyors;

     - **(B)** One (1) partially enclosed railcar unloading area.

     - **(i)** Intake hopper(s); and

     - **(ii)** Enclosed conveyors;

  2. **(2)** Grain Handling, Pre-Cleaning, and Storage, with a maximum throughput capacity of 490 tons of raw wheat per hour, and including:

     - **(A)** Twelve (12) enclosed conveyors;

     - **(B)** Three (3) enclosed bucket elevators;

     - **(C)** Enclosed headhouse distribution system; controlled by one (1) baghouse, identified as Filter #03, exhausting to stack S3;
(D) Two (2) intake pre-cleaning machine(s); controlled by one (1) baghouse, identified as Filter #02, exhausting to stack S2; and

(E) Fourteen (14) storage bins, with a total maximum storage capacity of 960,000 bushels, uncontrolled and exhausting outside the building;

(F) Two (2) Grain storage bins, identified as Bin #17 and Bin #18, approved in 2020 for construction, each with a maximum storage capacity of 600,000 bushels, controlled by Baghouses #1, #2 and #3 and exhausting to stacks S1, S2 and S3, respectively.

Under 40 CFR 60, Subpart DD, AUMF-60787 is considered an affected facility.

(b) Cleaning House, identified as emission unit AUMF-60770, constructed in 2014, modified in 2014 to add two (2) enclosed conveyors, with a maximum capacity of 30 tons of raw wheat per hour and a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and including:

1. Four (4) raw wheat bins, with a total storage capacity of 400 tons;
2. Three (3) enclosed bucket elevators;
3. Nine (9) enclosed conveyors;
4. Grain cleaning operation, controlled by one (1) baghouse, identified as Filter #5, exhausting to Stack S5, and including:
   (A) Separator(s);
   (B) Aspirator(s);
   (C) Magnetic Separator(s);
   (D) Color Sorters;
   (E) Scourer(s);
   (F) Surge Bin;
5. Tempering Bin(s);
6. Enclosed pneumatic conveying, controlled by one (1) baghouse, identified as Filter #6, and exhausting to Stack S6; and
7. Three (3) cleaned wheat bins, with a total storage capacity of 300 tons, all exhausting to Stack S7S, including:
   (A) One (1) light wheat bin, with a total storage capacity of 100 tons, controlled by one (1) baghouse, identified as Filter #17;
   (B) One (1) un-ground screenings bin, with a total storage capacity of 100 tons, controlled by one (1) baghouse, identified as Filter #18; and
   (C) One (1) ground screenings bin, with a total storage capacity of 100 tons, controlled by one (1) baghouse, identified as Filter #19.

Under 40 CFR 60, Subpart DD, AUMF-60770 is considered an affected facility.
(c) Mill House, identified as emission unit AUMF-60769, constructed in 2014, with a maximum capacity of 25 tons of raw wheat per hour, including:

1. Enclosed conveyors;

   Under 40 CFR 60, Subpart DD, these enclosed conveyors are considered an affected facility.

2. Enclosed pneumatic conveying;

3. Impact Machine(s);

4. Stock hopper(s);

5. Roller Mills;

6. Pin mill(s);

7. Bran finisher(s);

8. Plan sifter(s), controlled by three (3) baghouses, identified as Filter #07 and Filter #08, and Filter #09, and exhausting to stacks S7, S8, and S9;

9. Purifier(s), controlled by one (1) baghouse, identified as Filter #09, and exhausting to stack S9; and


(d) Finished Product, Byproduct, & Mill Feed Handling, Storage, Loadout, and Shipping, constructed in 2014, modified in 2014 to add one (1) Total Receiver - High Ash Flour, with a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year:

1. Finished Product Handling & Storage, identified as emission unit AUMF-60629, including:

   A. Enclosed pneumatic conveying;

   B. Enclosed headhouse distribution system, identified as Total Receiver - High Ash Flour Line, controlled by one (1) baghouse, identified as Filter #20, and exhausting to stack HV-N;

   C. Eight (8) airlock hoppers;

   D. One (1) micro ingredients system;

   E. One (1) flour blending system, including:

      i. Enclosed headhouse distribution system;

      ii. Five (5) blender/mixer/agitators;

      iii. One (1) totally enclosed chlorine gas flour bleaching system:

         AA. Fourteen (14), 114 gallon, pressurized chlorine storage tanks, one (1) ton, each, for a total maximum storage
capacity of 1,596 gallons or fourteen (14) tons;

(BB) Chlorine gas lines;

(iv) Enclosed pneumatic conveying;

(F) One (1) 10 ton intermediate storage bin, identified as Start-up Bin, controlled by one (1) baghouse, identified as #21, and exhausting to stack S7S;

(G) Twelve (12) finished product storage bins (one of the bins is divided into two), with a total [combined] storage capacity of 1,440 tons of flour, controlled by twelve (12) baghouses, identified as #22, #23, #24, #25, #26, #27, #28, #29, #30, #31. Filters #22, #23, and #24 exhaust through a horizontal vent on the East side of the building (HV-S); Filter #25 exhausts to stack HV-N; Filters #27 and #28 exhaust through a horizontal vent on the East side of the building (HV-N); and Filters #29, #30, and #31 exhaust through stack S7N.

(H) Total Receiver - High Ash Flour, controlling particulate emissions with one (1) baghouse, identified as Filter #26, and exhausting to stack S7S;

(2) Bulk Plant and Finished Product Loadout, identified as emission unit AUMF-60775, and including:

(A) Enclosed pneumatic conveying;

(B) Enclosed headhouse distribution system, identified as Total Receiver, controlled by one (1) baghouse, identified as Filter #10, and exhausting to Stack S10;

(C) Four (4) storage bins for bulk flour load out, with a total storage capacity 810 tons, controlled by four (4) baghouses, identified as Filter #39, Filter #40, Filter #41, and Filter #42, and exhausting to stack S7N;

(D) The bulk plant bagging operation and enclosed loadout area for bulk shipment via trucks and railcars, including:

(i) Enclosed pneumatic conveying, controlled by two (2) baghouses, identified as Filter #34 and Filter #35, exhausting inside the building;

(ii) Two (2) storage bins for packing flour, with a total storage capacity of 20 tons, controlled by two (2) baghouses, identified as Filter #36 and Filter #37, and exhausting to stack S5-1;

(iii) Sifters, controlled by one (1) baghouse, identified as Filter #33, and exhausting inside the building;

(iv) Scales;

(v) Bagging station(s);

(vi) Belt conveyors;

(vii) Metal detector(s);

(xiii) Label printer(s); and
(ix) Pallet wrapping station(s).

(3) Byproducts and Mill Feed Storage, Handling, And Loadout, identified as emission unit AUMF-60778, and including:

(A) Byproducts and Mill Feed Storage, and Handling, controlled by one (1) baghouse, identified as Filter #12, exhausting to stack S12, and including:

(i) Three (3) enclosed bucket elevators;

(ii) Five (5) conveyors;

(iii) Enclosed pneumatic conveying;

(iv) One (1) storage bin for food grade bran, with a total storage capacity of 60 tons;

(v) Three (3) storage bins for Mill Feed, with a total storage capacity of 180 tons and

(vi) Two (2) storage bins for screenings, with a total storage capacity of 38 tons; and

(B) One (1) storage bin for Red Dog, with a total storage capacity of 60 tons, controlled by one (1) baghouse, identified as Filter #43, and exhausting to stack S7S;

(C) Enclosed loadout area for bulk shipment via trucks, controlled by a four compartment fabric filter canopy for dust suppression, identified as Filter #13, Filter #14, Filter #15, and Filter #16, vented inside the enclosed loadout area, and including a Platform Scale.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

(a) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(b) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

(d) Cleaners and solvents characterized as follows:

(A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 ºC (100 ºF) or;

(B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 ºC (68 ºF); the use of which for all cleaners and solvents combined does not exceed one hundred forty-five (145) gallons per twelve (12) months;

(e) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than forty-six hundredths (0.46) cubic meters (121.5
DRAFT

(gallons) and the container is closed, except when the material is added or removed;

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other
air filtration equipment; and

(g) Closed loop heating and cooling systems.

(a) Paved roads with limited public access [326 IAC 6-4, 326 IAC 6.5]

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in
326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM),
Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).
SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F029-40814-00045, is issued for a fixed term of ten (10) 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.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual", as defined by
(2) The certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

   Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
   Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   Facsimile Number: 317-233-6865
   Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

(a) All terms and conditions of permits established prior to F029-40814-00045 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
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(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional
information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10
or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be
submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Any such application does require a certification that meets the requirements of
326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the
request for an administrative amendment immediately upon submittal of the request.
[326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
(a) The Permittee may make any change or changes at the source that are described in
326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following
conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air
Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which
document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][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 FESOP 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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<tr>
<th>B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]</th>
</tr>
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<tr>
<td>(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.</td>
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<tr>
<td>(b) Failure to pay may result in administrative enforcement action or revocation of this permit.</td>
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<tr>
<td>(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.</td>
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<tr>
<th>B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
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Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source’s potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source’s potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.5 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]  
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

1. When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

2. If there is a change in the following:

   (A) Asbestos removal or demolition start date;
   (B) Removal or demolition contractor; or
   (C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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.

Testing Requirements [326 IAC 2-8-4(3)]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

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

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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
The response may include, but is not limited to, the following:

1. Initial inspection and evaluation;
2. Recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
3. Any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

1. Monitoring results;
2. Review of operation and maintenance procedures and records; and/or
3. Inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(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. Support information includes the following, where applicable:

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

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

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
DRAFT

(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

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

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

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-8-4(10)]: Wheat Mill

(a) Whole Grain Receiving, Handling, Pre-Cleaning, and Storage Operations, identified as emission unit AUMF-60787, constructed in 2014, having a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and consisting of the following:

1. Whole Grain Receiving, with a maximum throughput capacity of 550 tons of raw wheat per hour, controlled by one (1) baghouse, identified as Filter #01, exhausting to stack S1, and including:
   - One (1) partially enclosed truck unloading area; and
   - Intake hopper(s); and
   - Enclosed conveyors;

2. Grain Handling, Pre-Cleaning, and Storage, with a maximum throughput capacity of 490 tons of raw wheat per hour, and including:
   - Twelve (12) enclosed conveyors;
   - Three (3) enclosed bucket elevators;
   - Enclosed headhouse distribution system; controlled by one (1) baghouse, identified as Filter #03, exhausting to stack S3;
   - Two (2) intake pre-cleaning machine(s); controlled by one (1) baghouse, identified as Filter #02, exhausting to stack S2; and
   - Fourteen (14) storage bins, with a total maximum storage capacity of 960,000 bushels, uncontrolled and exhausting outside the building;
   - Two (2) Grain storage bins, identified as Bin #17 and Bin #18, approved in 2020 for construction, each with a maximum storage capacity of 600,000 bushels, controlled by Baghouses #1, #2 and #3 and exhausting to stacks S1, S2 and S3, respectively.

(b) Cleaning House, identified as emission unit AUMF-60770, constructed in 2014, modified in 2014 to add two (2) enclosed conveyors, with a maximum capacity of 30 tons of raw wheat per hour and a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and including:

1. Four (4) raw wheat bins, with a total storage capacity of 400 tons;
(2) Three (3) enclosed bucket elevators;

(3) Nine (9) enclosed conveyors;

(4) Grain cleaning operation, controlled by one (1) baghouse, identified as Filter #5, exhausting to Stack S5, and including:
   (A) Separator(s);
   (B) Aspirator(s);
   (C) Magnetic Separator(s);
   (D) Color Sorters;
   (E) Scourer(s);
   (F) Surge Bin;

(5) Tempering Bin(s);

(6) Enclosed pneumatic conveying, controlled by one (1) baghouse, identified as Filter #6, and exhausting to Stack S6; and

(7) Three (3) cleaned wheat bins, with a total storage capacity of 300 tons, all exhausting to Stack S7S, including:
   (A) One (1) light wheat bin, with a total storage capacity of 100 tons, controlled by one (1) baghouse, identified as Filter #17;
   (B) One (1) un-ground screenings bin, with a total storage capacity of 100 tons, controlled by one (1) baghouse, identified as Filter #18; and
   (C) One (1) ground screenings bin, with a total storage capacity of 100 tons, controlled by one (1) baghouse, identified as Filter #19.

Under 40 CFR 60, Subpart DD, AUMF-60770 is considered an affected facility.

(c) Mill House, identified as emission unit AUMF-60769, constructed in 2014, with a maximum capacity of 25 tons of raw wheat per hour, including

(1) Enclosed conveyors;

Under 40 CFR 60, Subpart DD, these enclosed conveyors are considered an affected facility.

(2) Enclosed pneumatic conveying;

(3) Impact Machine(s);

(4) Stock hopper(s);

(5) Roller Mills;

(6) Hammer mill;
(7) Pin mill(s);

(8) Bran finisher(s);

(9) Plan sifter(s), controlled by three (3) baghouses, identified as Filter #07 and Filter #08, and Filter #09, and exhausting to stacks S7, S8, and S9;

(10) Purifier(s), controlled by one (1) baghouse, identified as Filter #09, and exhausting to stack S9; and

(11) High efficiency cyclone collectors.

(d) Finished Product, Byproduct, & Mill Feed Handling, Storage, Loadout, and Shipping, constructed in 2014, modified in 2014 to add one (1) Total Receiver - High Ash Flour, with a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year:

(1) Finished Product Handling & Storage, identified as emission unit AUMF-60629, including:

(A) Enclosed pneumatic conveying;

(B) Enclosed headhouse distribution system, identified as Total Receiver - High Ash Flour Line, controlled by one (1) baghouse, identified as Filter #20, and exhausting to stack HV-N;

(C) Eight (8) airlock hoppers;

(D) One (1) micro ingredients system;

(E) One (1) flour blending system, including:

(i) Enclosed headhouse distribution system;

(ii) Five (5) blender/mixer/agitators;

(iii) One (1) totally enclosed chlorine gas flour bleaching system:

(AA) Fourteen (14), 114 gallon, pressurized chlorine storage tanks, one (1) ton, each, for a total maximum storage capacity of 1,596 gallons or fourteen (14) tons;

(BB) Chlorine gas lines;

(iv) Enclosed pneumatic conveying;

(F) One (1) 10 ton intermediate storage bin, identified as Start-up Bin, controlled by one (1) baghouse, identified as #21, and exhausting to stack S7S;

(G) Twelve (12) finished product storage bins (one of the bins is divided into two), with a total [combined] storage capacity of 1,440 tons of flour, controlled by twelve (12) baghouses, identified as #22, #23, #24, #25, #26, #27, #28, #29, #30, #31. Filters #22, #23, and #24 exhaust through a horizontal vent on the East side of the building (HV-S); Filter #25 exhausts to stack HV-N; Filters
#27 and #28 exhaust through a horizontal vent on the East side of the building (HV-N); and Filters #29, #30, and #31 exhaust through stack S7N.

(H) Total Receiver - High Ash Flour, controlling particulate emissions with one (1) baghouse, identified as Filter #26, and exhausting to stack S7S;

(2) Bulk Plant and Finished Product Loadout, identified as emission unit AUMF-60775, and including:

(A) Enclosed pneumatic conveying;

(B) Enclosed headhouse distribution system, identified as Total Receiver, controlled by one (1) baghouse, identified as Filter #10, and exhausting to Stack S10;

(C) Four (4) storage bins for bulk flour load out, with a total storage capacity 810 tons, controlled by four (4) baghouses, identified as Filter #39, Filter #40, Filter #41, and Filter #42, and exhausting to stack S7N;

(D) The bulk plant bagging operation and enclosed loadout area for bulk shipment via trucks and railcars, including:

(i) Enclosed pneumatic conveying, controlled by two (2) baghouses, identified as Filter #34 and Filter #35, exhausting inside the building;

(ii) Two (2) storage bins for packing flour, with a total storage capacity of 20 tons, controlled by two (2) baghouses, identified as Filter #36 and Filter #37, and exhausting to stack S5-1;

(iii) Sifters, controlled by one (1) baghouse, identified as Filter #33, and exhausting inside the building;

(iv) Scales;

(v) Bagging station(s);

(vi) Belt conveyors;

(vii) Metal detector(s);

(xiii) Label printer(s); and

(ix) Pallet wrapping station(s).

(3) Byproducts and Mill Feed Storage, Handling, And Loadout, identified as emission unit AUMF-60778, and including:

(A) Byproducts and Mill Feed Storage, and Handling, controlled by one (1) baghouse, identified as Filter #12, exhausting to stack S12, and including:

(i) Three (3) enclosed bucket elevator;

(ii) Five (5) conveyors;

(iii) Enclosed pneumatic conveying;
(iv) One (1) storage bin for food grade bran, with a total storage capacity of 60 tons;

(v) Three (3) storage bins for Mill Feed, with a total storage capacity of 180 tons and

(vi) Two (2) storage bins for screenings, with a total storage capacity of 38 tons; and

(B) One (1) storage bin for Red Dog, with a total storage capacity of 60 tons, controlled by one (1) baghouse, identified as Filter #43, and exhausting to stack S7S;

(C) Enclosed loadout area for bulk shipment via trucks, controlled by a four compartment fabric filter canopy for dust suppression, identified as Filter #13, Filter #14, Filter #15, and Filter #16, vented inside the enclosed loadout area, and including a Platform Scale.

(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 2-8-4(1)]

**D.1.1 PM, PM10 and PM2.5 PSD Minor Limits and FESOP Limits [326 IAC 2-8-4] [326 IAC 2-2]**

In order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(a) The amount of grain processed at AUMF-60787 shall not exceed 219,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) PM, PM10 and PM2.5 emissions shall not exceed the limits specified in the table below:
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<th>Emissions Unit Description (Unit ID)</th>
<th>Process</th>
<th>Baghouse or Filter #</th>
<th>Stack ID</th>
<th>Stack Limit PM (lbs/hr)</th>
<th>PM Limitation (lbs/hr)*</th>
<th>PM10 Limitation (lbs/hr)*</th>
<th>PM2.5 Limitation (lbs/hr)*</th>
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<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td>High Ash Bin</td>
<td>30</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cake Flour Bin</td>
<td>31</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Outload Bin</td>
<td>39</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Outload Bin</td>
<td>40</td>
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<tr>
<td></td>
<td>Outload Bin</td>
<td>41</td>
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<tr>
<td></td>
<td>Outload Bin</td>
<td>42</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AUMF-60775</td>
<td>Flour Line Sifter to Load Out Bins</td>
<td>33</td>
<td>N/A</td>
<td>0.06</td>
<td>0.06</td>
<td>0.02</td>
<td>0.02</td>
</tr>
<tr>
<td></td>
<td>Total Receiver Vacuum System</td>
<td>34</td>
<td></td>
<td>0.25</td>
<td>0.25</td>
<td>0.08</td>
<td>0.08</td>
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<tr>
<td></td>
<td>Packer Aspiration Filter</td>
<td>35</td>
<td></td>
<td>0.18</td>
<td>0.18</td>
<td>0.06</td>
<td>0.06</td>
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<tr>
<td></td>
<td>Patent Packing Bin</td>
<td>36</td>
<td>S5-1</td>
<td>0.50</td>
<td>0.50</td>
<td>0.17</td>
<td>0.17</td>
</tr>
</tbody>
</table>
### Patent Packing Bin

**AUMF 60778**

<table>
<thead>
<tr>
<th>Patent Packing Bin</th>
<th>37</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mill Feed Outload Bin</td>
<td>13</td>
</tr>
<tr>
<td>Mill Feed Outload Bin</td>
<td>14</td>
</tr>
<tr>
<td>Mill Feed Outload Bin</td>
<td>15</td>
</tr>
<tr>
<td>Mill Feed Outload Bin</td>
<td>16</td>
</tr>
</tbody>
</table>

*Based on grain loading and maximum throughput

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

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

### D.1.2 Particulate Emission Limits [326 IAC 6.5-1-2]

(a) Pursuant to 326 IAC 6.5-1-2(d)(1), particulate matter emissions from AUMF-60787 and AUMF-60770 and pursuant to 326 IAC 6.5-1-2(a), each of the remaining emission unit listed in this Section shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)); and

(b) Pursuant to 326 IAC 6.5-1-2(d)(2), AUMF-60787, AUMF-60770 and AUMF-60769 shall comply with the following:

1. Housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

   **(A)** Housekeeping practices shall be conducted as follows:

   (i) Areas to be swept and maintained shall include, at a minimum, the following:

   (AA) General grounds, yard, and other open areas.

   (BB) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.

   (CC) Grain driers with respect to accumulated particulate matter.

   (ii) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.

   (iii) Dust from driveways, access roads, and other areas of travel shall be controlled.

   (iv) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day’s operation.
(B) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:

(i) Malfunctions.
(ii) Breakdowns.
(iii) Improper adjustment.
(iv) Operating above the rated or designed capacity.
(v) Not following designed operating specifications.
(vi) Lack of good preventive maintenance care.
(vii) Lack of critical and proper spare replacement parts on hand.
(viii) Lack of properly trained and experienced personnel.

(C) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

D.1.3 Preventive Maintenance Plan  [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan is required for these facilities and any corresponding control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.4 Particulate Control

(a) The baghouses/filters listed in this section shall be in operation and control emissions from its associated emission units at all times when the associated emission units are in operation.

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

D.1.5 Testing Requirements  [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

(a) No later than five (5) years from the most recent valid compliance demonstration, in order to demonstrate compliance with Condition D.1.1(b), the Permittee shall perform PM, PM10, and PM2.5 testing for of the control devices in each group as specified in the following table, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing of any individual control device within a group shall not be repeated until each control device within every group has been tested. The control device tested within a Group shall be the one in which the longest amount of time has elapsed since its previous test. In addition to these requirements, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's
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obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable particulate matter.

<table>
<thead>
<tr>
<th>Group ID</th>
<th>Control Devices</th>
</tr>
</thead>
<tbody>
<tr>
<td>Group 1</td>
<td>Filter 01 (grain loading 0.01 gr/dscf)</td>
</tr>
<tr>
<td>Group 2</td>
<td>Filter 02 (grain loading 0.02 gr/dscf)</td>
</tr>
<tr>
<td>Group 3</td>
<td>Filters 03, 05, 06, 07, 08, 09, 10, 12, 13, 14, 15, 16, 17, 18, 19, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 33, 34, 35, 36, 37 (grain loading 0.03 gr/dscf)</td>
</tr>
</tbody>
</table>

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

(a) Visible emission notations from the following stacks/vents shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

<table>
<thead>
<tr>
<th>Process</th>
<th>Stack/vent IDs</th>
</tr>
</thead>
<tbody>
<tr>
<td>AUMF-60787</td>
<td>S1, S2 and S3</td>
</tr>
<tr>
<td>AUMF-60770</td>
<td>S5 and S6</td>
</tr>
<tr>
<td>AUMF-60769</td>
<td>S7, S8 and S9</td>
</tr>
<tr>
<td>AUMF-60629</td>
<td>S7S, S7N and vents HV-S and HV-N</td>
</tr>
<tr>
<td>AUMF-60775</td>
<td>S10, S7N and S5-1</td>
</tr>
<tr>
<td>AUMF-60778</td>
<td>S12 and S7S</td>
</tr>
</tbody>
</table>

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the pressure drop across the dust collectors listed in the table below in conjunction with its associated emission units at least once per day when one or more of the associated emission units is in operation. When, for any one reading, the pressure drop across a baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for each baghouse is a pressure drop between three (3.0) and five (5.0) inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test.
Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above-mentioned range(s) is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument(s) used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.1.8 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1 (a), the Permittee shall maintain records of the amount of grain processed at AUMF-60787 each month and each compliance period.

(b) To document the compliance status with Conditions D.1.6, the Permittee shall maintain records once per day of the visible emission notations. The Permittee shall include in each of its daily records when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

(c) To document the compliance status with Conditions D.1.7, the Permittee shall maintain records once per day of the pressure drop during normal operation. The Permittee shall include in each of its daily records when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

(d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
D.1.9 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Condition D.1.1(a) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).
SECTION D.2 EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description [326 IAC 2-7-5(14)]:

(d) Cleaners and solvents characterized as follows:

(A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 °C (100 °F) or;

(B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 °C (68 °F); the use of which for all cleaners and solvents combined does not exceed one hundred forty-five (145) gallons per twelve (12) months;

(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 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control and Equipment Operating Requirements), the Permittee shall:

(a) Ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) A refrigerated chiller.

(D) Carbon adsorption.

(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the
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department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:
   (A) must be a solid, fluid stream; and
   (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(1)]

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.4 Record Keeping Requirements

To document the compliance status with Condition D.2.2, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

(a) The name and address of the solvent supplier.

(b) The date of purchase.

(c) The type of solvent purchased.

(d) The total volume of the solvent purchased.

(e) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
SECTION E.1 NSPS

Emissions Unit Description:

(a) Whole Grain Receiving, Handling, Pre-Cleaning, and Storage Operations, identified as emission unit AUMF-60787, constructed in 2014, having a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and consisting of the following:

(1) Whole Grain Receiving, with a maximum throughput capacity of 550 tons of raw wheat per hour, controlled by one (1) baghouse, identified as Filter #01, exhausting to stack S1, and including:

(A) One (1) partially enclosed truck unloading area; and
   (i) Intake hopper(s); and
   (ii) Enclosed conveyors;

(B) One (1) partially enclosed railcar unloading area.
   (i) Intake hopper(s); and
   (ii) Enclosed conveyors;

(2) Grain Handling, Pre-Cleaning, and Storage, with a maximum throughput capacity of 490 tons of raw wheat per hour, and including:

(A) Twelve (12) enclosed conveyors;

(B) Three (3) enclosed bucket elevators;

(C) Enclosed headhouse distribution system; controlled by one (1) baghouse, identified as Filter #03, exhausting to stack S3;

(D) Two (2) intake pre-cleaning machine(s); controlled by one (1) baghouse, identified as Filter #02, exhausting to stack S2; and

(E) Fourteen (14) storage bins, with a total maximum storage capacity of 960,000 bushels, uncontrolled and exhausting outside the building;

(F) Two (2) Grain storage bins, identified as Bin #17 and Bin #18, approved in 2020 for construction, each with a maximum storage capacity of 600,000 bushels, controlled by Baghouses #1, #2 and #3 and exhausting to stacks S1, S2 and S3, respectively.

Under 40 CFR 60, Subpart DD, AUMF-60787 is considered an affected facility.

(b) Cleaning House, identified as emission unit AUMF-60770, constructed in 2014, modified in 2014 to add two (2) enclosed conveyors, with a maximum capacity of 30 tons of raw wheat per hour and a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and including:

(1) Four (4) raw wheat bins, with a total storage capacity of 400 tons;
(2) Three (3) enclosed bucket elevators;

(3) Nine (9) enclosed conveyors;

(4) Grain cleaning operation, controlled by one (1) baghouse, identified as Filter #5, exhausting to Stack S5, and including;
   (A) Separator(s);
   (B) Aspirator(s);
   (C) Magnetic Separator(s);
   (D) Color Sorters;
   (E) Scourer(s);
   (F) Surge Bin;

(5) Tempering Bin(s);

(6) Enclosed pneumatic conveying, controlled by one (1) baghouse, identified as Filter #6, and exhausting to Stack S6; and

(7) Three (3) cleaned wheat bins, with a total storage capacity of 300 tons, all exhausting to Stack S5, including;
   (A) One (1) light wheat bin, with a total storage capacity of 100 tons, controlled by one (1) baghouse, identified as Filter #17;
   (B) One (1) un-ground screenings bin, with a total storage capacity of 100 tons, controlled by one (1) baghouse, identified as Filter #18; and
   (C) One (1) ground screenings bin, with a total storage capacity of 100 tons, controlled by one (1) baghouse, identified as Filter #19.

Under 40 CFR 60, Subpart DD, AUMF-60770 is considered an affected facility.

(c) Mill House, identified as emission unit AUMF-60769, constructed in 2014, with a maximum capacity of 25 tons of raw wheat per hour, including

   (1) Enclosed conveyors;

   Under 40 CFR 60, Subpart DD, these enclosed conveyors are considered an affected facility.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4(1)]

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1]
   [40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by
reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart DD.

(b) Pursuant to 40 CFR 60.4, 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

E.1.2 Grain Elevators NSPS [326 IAC 12] [40 CFR Part 60, Subpart DD]
The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart DD (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

(1) 40 CFR 60.300
(2) 40 CFR 60.301
(3) 40 CFR 60.302
(4) 40 CFR 60.303
(5) 40 CFR 60.304

Compliance Determination Requirements [326 IAC 2-8-4(1)]

E.1.3 Testing Requirements [326 IAC 2-1.1-11]
In order to document the compliance status with Condition E.1.2, the Permittee shall perform the testing required under 40 CFR 60, Subpart DD, utilizing methods as approved by the Commissioner, at least once every five (5) years from the date of the most recent valid compliance demonstration. Section C - Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.
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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Whitewater Mill, LLC
Source Address: 707 Harrison Brookville Road, West Harrison, Indiana 47060
FESOP Permit No.: F029-40814-00045

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter
☐ Test Result (specify)_____________________________________________________
☐ Report (specify)________________________________________________________
☐ Notification (specify)__________________________________________________
☐ Affidavit (specify)_____________________________________________________
☐ Other (specify)_________________________________________________________

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

Signature:

Printed Name:

Title/Position:

Date:
This is an emergency as defined in 326 IAC 2-7-1(12):
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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

- Facility/Equipment/Operation:
- Control Equipment:
- Permit Condition or Operation Limitation in Permit:
- Description of the Emergency:
- Describe the cause of the Emergency:
If any of the following are not applicable, mark N/A

<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency was corrected:</td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
</tr>
<tr>
<td>Describe:</td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
</tr>
<tr>
<td>If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:</td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________

Title / Position: ________________________________

Date: ________________________________

Phone: ________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Whitewater Mill, LLC
Source Address: 707 Harrison Brookville Road, West Harrison, Indiana 47060
FESOP Permit No.: F029-40814-00045
Facility: AUMF-60787
Parameter: Grain Throughput
Limit: The amount of grain processed at AUMF-60787 shall not exceed 219,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Grain Throughput (tons)</td>
<td>Grain Throughput (tons)</td>
<td>Grain Throughput (tons)</td>
</tr>
<tr>
<td></td>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
  Deviation has been reported on: ___________________

Submitted by: _____________________________________________________
Title / Position: ____________________________________________________
Signature: ________________________________________________________
Date: ____________________________________________________________
Phone: ___________________________________________________________
This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
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<tbody>
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<td>Response Steps Taken:</td>
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</table>

Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
Indiana Department of Environmental Management  
Office of Air Quality  

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Description and Location

Source Name: Whitewater Mill, LLC  
Source Location: 707 Harrison Brookville Road, West Harrison, IN 47060  
County: Dearborn (Harrison Township)  
SIC Code: 2041 (Flour and Other Grain Mill Products)  
Permit Renewal No.: F029-40814-00045  
Significant Permit Revision No.: 029-43348-00045  
Permit Reviewer: L. David Cohen

Existing Approvals

The source was issued FESOP Renewal No. F029-40814-00045 on July 8, 2019. The source has since received the following approval:

(a) FESOP SPR No. 029-42226-00045, issued on March 9, 2020.

County Attainment Status

The source is located in Dearborn (Harrison Township) County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO\textsubscript{2}</td>
<td>Cannot be classified.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O\textsubscript{3}</td>
<td>Attainment effective April 7, 2017, for the 2008 8-hour ozone standard for Lawrenceburg Township. Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM\textsubscript{2.5}</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM\textsubscript{2.5} standard.</td>
</tr>
<tr>
<td>PM\textsubscript{2.5}</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM\textsubscript{2.5} standard.</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO\textsubscript{2}</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO\textsubscript{2} 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 (NO\textsubscript{x}) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO\textsubscript{x} emissions are considered when evaluating the rule applicability relating to ozone. Dearborn County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO\textsubscript{x} emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM\textsubscript{2.5}  
Dearborn County has been classified as attainment for PM\textsubscript{2.5}. Therefore, direct PM\textsubscript{2.5}, SO\textsubscript{2}, and NO\textsubscript{x} emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(c) Other Criteria Pollutants
Dearborn County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

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

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf](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.

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits. 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>Source-Wide Emissions Prior to Revision (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 Fugitive Emissions*</td>
<td>124.09</td>
<td>49.47</td>
<td>46.44</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.0001</td>
<td>0.0001</td>
<td></td>
</tr>
</tbody>
</table>
Source-Wide Emissions Prior to Revision (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂₅¹,₂</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>Title V Major Source</td>
<td>NA</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>Thresholds</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>PSD Major Source</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
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<td>Thresholds</td>
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</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂₅ listed is direct PM₂₅.
³Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of FESOP SPR No. 029-42226-00045, issued on March 9, 2020.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Whitewater Mill, LLC on October 3, 2020, relating to the revision of FESOP limits due to misidentification of control devices and stacks in the current permit. There are no new or modified units included in this permitting action.

Enforcement Issues

There are no enforcement actions related to this revision.

Emission Calculations

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

Permit Level Determination – FESOP Significant Permit Revision

There are no new emission units or modifications to existing emission units (i.e., no physical change or change in the method of operation occurring at the source) as a result of this revision. See the "Description of Proposed Revision" section above for more detail.

Pursuant to 326 IAC 2-8-11.1(f), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves adjusting FESOP limits.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the revision, and only to the extent that the effect of the control equipment is made practically enforceable in
the permit. 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>Source-Wide Emissions After Issuance (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM¹</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</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 potential to emit of the entire source after issuance.

The source opted to take PM₁₀ and PM₂.₅ limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset), 326 IAC 2-8 (FESOP) for more information regarding the limit(s).

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit regulated air pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this proposed revision.

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 limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<table>
<thead>
<tr>
<th>State Rule Applicability - Entire Source</th>
</tr>
</thead>
</table>

Due to this revision, state rule applicability has been reviewed as follows:

**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 2-2 (PSD) (PSD) and 326 IAC 2-8-4 (FESOP)**
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

**FESOP and PSD Minor Source Limit(s)**
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD), not applicable, the Permittee shall comply with the following:

(a) The amount of grain processed at AUMF-60787 shall not exceed 219,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) PM, PM10 and PM2.5 emissions shall not exceed the limits specified in the table below:
<table>
<thead>
<tr>
<th>Emissions Unit Description (Unit ID)</th>
<th>Process</th>
<th>Baghouse or Filter #</th>
<th>Stack ID</th>
<th>Stack Limit PM (lbs/hr)</th>
<th>PM Limitation (lbs/hr)*</th>
<th>PM10 Limitation (lbs/hr)*</th>
<th>PM2.5 Limitation (lbs/hr)*</th>
</tr>
</thead>
<tbody>
<tr>
<td>AUMF-60787</td>
<td>Wheat Intake and Bins #17 and #18</td>
<td>1</td>
<td>S1</td>
<td>4.66</td>
<td>4.66</td>
<td>2.33</td>
<td>2.33</td>
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<tr>
<td>Pre-Cleaning and Bins #17 #18</td>
<td>2</td>
<td>S2</td>
<td>3.95</td>
<td>3.95</td>
<td>2.45</td>
<td>2.45</td>
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<tr>
<td>Silo Chain Conveyor and Bins #17 and #18</td>
<td>3</td>
<td>S3</td>
<td>0.33</td>
<td>0.33</td>
<td>0.11</td>
<td>0.11</td>
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<tr>
<td>AUMF-60770</td>
<td>Cleanings</td>
<td>5</td>
<td>S5</td>
<td>1.04</td>
<td>1.04</td>
<td>0.35</td>
<td>0.35</td>
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<tr>
<td>Light Wheat Bin</td>
<td>17</td>
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<tr>
<td>Unground Screenings Bin</td>
<td>18</td>
<td>S7S</td>
<td>3.49</td>
<td>3.12</td>
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<td>S6</td>
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<td>AUMF-60769</td>
<td>Mill - Pneumatic</td>
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<td>S7</td>
<td>3.00</td>
<td>3.00</td>
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<tr>
<td>Mill - Pneumatic</td>
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<td>S8</td>
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<tr>
<td>Mill - Aspiration</td>
<td>9</td>
<td>S9</td>
<td>2.48</td>
<td>2.48</td>
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<tr>
<td>AUMF-60629</td>
<td>Total Receiver</td>
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<td>S10</td>
<td>0.48</td>
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<td>AUMF-60778</td>
<td>Bran Bins</td>
<td>12</td>
<td>S12</td>
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<td>0.93</td>
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<tr>
<td>AUMF-60629 and AUMF 60778</td>
<td>Total Receiver High Ash Flour Line</td>
<td>20</td>
<td>HV-N</td>
<td>0.23</td>
<td>0.12</td>
<td>0.04</td>
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<td></td>
<td>Start Up Bin</td>
<td>21</td>
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<td>Total Receiver High Ash Flour Line</td>
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<td>RED DOG Bin</td>
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<td>AUMF-60629</td>
<td>Airlock Hopper Clear Flour</td>
<td>22</td>
<td>HV-S</td>
<td>0.05</td>
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<td>Airlock Hopper Patent Flour</td>
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<td>Airlock Hopper Whole Wheat Flour</td>
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<tr>
<td></td>
<td>HV-N Already Included</td>
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<tr>
<td>AUMF-60629</td>
<td>Airlock Hopper Flour to Packing</td>
<td>27</td>
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<td></td>
<td>HV-N Already Included</td>
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<td>AUMF-60629 and AUMF 60775</td>
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<td>Outload Bin</td>
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<td>Outload Bin</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AUMF-60775</td>
<td>Flour Line Sifter to Load Out Bins</td>
<td>33</td>
<td>N/A</td>
<td>0.06</td>
<td>0.06</td>
<td>0.02</td>
<td>0.02</td>
</tr>
<tr>
<td></td>
<td>Total Receiver Vacuum System</td>
<td>34</td>
<td></td>
<td>0.25</td>
<td>0.25</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td></td>
<td>Packer Aspiration Filter</td>
<td>35</td>
<td></td>
<td>0.18</td>
<td>0.18</td>
<td>0.06</td>
<td>0.06</td>
</tr>
<tr>
<td>AUMF-60775</td>
<td>Patent Packing Bin</td>
<td>36</td>
<td>S5-1</td>
<td>0.5</td>
<td>0.50</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td></td>
<td>Patent Packing Bin</td>
<td>37</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

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 thirty percent (30%) 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)
This source is located in Dearborn County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide PTE of PM is 10 tons per year or more. Therefore, this source is subject to the requirements of 326 IAC 6.5-1-2 because the source-wide actual emissions of PM can be 10 tons per year or more.

In order to render the requirements of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County) not applicable, the Permittee shall comply with the following:

1. Pursuant to 326 IAC 6.5-1-2(d)(1), particulate matter emissions from the grain storage elevator equipment AUMF-60787, AUMF-60770, Bin #17 and Bin #18 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)); and

2. The requirements of 326 IAC 6.5-1-2(d)(2) apply to AUMF-60787, AUMF-60770 and AUMF-60769 because the grain is unloaded, handled, cleaned, dried, stored, or loaded at these facilities. The source shall comply the requirements of 326 IAC 6.5-1-2(d)(2) for these facilities.
326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Dearborn County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

### Compliance Determination and Monitoring Requirements

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

All baghouses at this source shall be in operation and control emissions from their associated emission units when their associated emission units are in operation, in order to comply with PSD Minor Source and FESOP Limits and 326 IAC 6.5 limits.

**Testing Requirements:**

The Permittee shall perform PM, PM10, and PM2.5 testing for one (1) of the control devices within each Group as specified in the following table:

[Note: The PSD minor and FESOP limits are based on grain loading of the controls and the maximum throughput of the units]

<table>
<thead>
<tr>
<th>Group ID</th>
<th>Control Devices</th>
<th>Timeframe for Testing</th>
<th>Frequency of Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Group 1</td>
<td>Filter 01 (grain loading 0.01 gr/dscf)</td>
<td>no later than five (5) years from the most recent valid compliance demonstration</td>
<td>every five (5) years</td>
</tr>
<tr>
<td>Group 2</td>
<td>Filter 02 (grain loading 0.02 gr/dscf)</td>
<td>no later than five (5) years from the most recent valid compliance demonstration</td>
<td>every five (5) years</td>
</tr>
<tr>
<td>Group 3</td>
<td>Filters 03, 05, 06, 07, 08, 09, 10, 12, 13, 14, 15, 16, 17, 18, 19, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 33, 34, 35, 36, 37 (grain loading 0.03 gr/dscf)</td>
<td>no later than five (5) years from the most recent valid compliance demonstration</td>
<td>every five (5) years</td>
</tr>
</tbody>
</table>

PM10 and PM2.5 includes filterable and condensable particulate matter.
Post-baghouse testing is required to demonstrate compliance with 326 IAC 2-8 (FESOP) and 326 IAC 6.5 (PM Limitations Except Lake County), and the limits that render 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD), not applicable.

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

<table>
<thead>
<tr>
<th>Process</th>
<th>Baghouse/Filter ID</th>
<th>Stack/vent ID</th>
<th>Monitoring Parameters</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>AUMF-60787</td>
<td>1</td>
<td>S1</td>
<td>visible emissions</td>
<td>Once per day</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>S3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AUMF-60770</td>
<td>5</td>
<td>S5</td>
<td>visible emissions</td>
<td>Once per day</td>
</tr>
<tr>
<td></td>
<td>17, 18, and 19</td>
<td>S7S</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>6</td>
<td>S6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AUMF-60769</td>
<td>7</td>
<td>S7</td>
<td>visible emissions</td>
<td>Once per day</td>
</tr>
<tr>
<td></td>
<td>8</td>
<td>S8</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>9</td>
<td>S9</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AUMF-60629</td>
<td>20, 25, 27, 28</td>
<td>HV-N</td>
<td>visible emissions</td>
<td>Once per day</td>
</tr>
<tr>
<td></td>
<td>21, 26, 43</td>
<td>S7S</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>22, 23, and 24</td>
<td>HV-S</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>29, 30, and 31</td>
<td>S7N</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AUMF-60775</td>
<td>10</td>
<td>S10</td>
<td>visible emissions</td>
<td>Once per day</td>
</tr>
<tr>
<td></td>
<td>39, 40, 41 and 42</td>
<td>S7N</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>33, 34 and 35</td>
<td>exhausting inside</td>
<td>pressure drop</td>
<td></td>
</tr>
<tr>
<td></td>
<td>36 and 37</td>
<td>S5-1</td>
<td>visible emissions</td>
<td></td>
</tr>
<tr>
<td>AUMF-60778</td>
<td>12</td>
<td>S12</td>
<td>visible emissions</td>
<td>Once per day</td>
</tr>
<tr>
<td></td>
<td>43</td>
<td>S7S</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>13, 14, 15 and 16</td>
<td>exhausting inside</td>
<td>pressure drop</td>
<td></td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the baghouses and filters must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 6.5 (PM Limitations Except Lake County), and the limits that render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

**Proposed Changes**

The following changes listed below are due to the proposed revision. Deleted language appears as strikethrough text and new language appears as bold text:

(1) Section A.2 of the permit has been revised to reflect changes to Stack IDs.

(2) Section D.1 of the permit has been revised to reflect changes to Stack IDs and changes to FESOP Minor limits.

**A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]**

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

(b) Cleaning House, identified as emission unit AUMF-60770, constructed in 2014, modified in 2014 to add two (2) enclosed conveyors, with a maximum capacity of 30 tons of raw wheat per hour and a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and including:
(7) Three (3) cleaned wheat bins, with a total storage capacity of 300 tons, all exhausting to Stack S5 S7S, including;

(d) Finished Product, Byproduct, & Mill Feed Handling, Storage, Loadout, and Shipping, constructed in 2014, modified in 2014 to add one (1) Total Receiver - High Ash Flour, with a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year:

(1) Finished Product Handling & Storage, identified as emission unit AUMF-60629, including:

(B) Enclosed headhouse distribution system, identified as Total Receiver - High Ash Flour Line, controlled by one (1) baghouse, identified as Filter #20, and exhausting to stack S7S HV-N;

(G) Twelve (12) finished product storage bins (one of the bins is divided into two), with a total [combined] storage capacity of 1,440 tons of flour, controlled by twelve (12) baghouses, identified as #22, #23, #24, #25, #26, #27, #28, #29, #30, #31. Filters #22, #23, and #24, and #25 exhaust through a horizontal vent on the East side of the building (HV-S); Filter #25 exhausts to stack HV-N; Filters #27 and #28 exhaust through a horizontal vent on the East side of the building (HV-N); and Filters #29, #30, and #31 exhaust through stack S7N.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-8-4(10)]: Wheat Mill

(b) Cleaning House, identified as emission unit AUMF-60770, constructed in 2014, modified in 2014 to add two (2) enclosed conveyors, with a maximum capacity of 30 tons of raw wheat per hour and a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and including:

(7) Three (3) cleaned wheat bins, with a total storage capacity of 300 tons, all exhausting to Stack S5 S7S, including;

(d) Finished Product, Byproduct, & Mill Feed Handling, Storage, Loadout, and Shipping, constructed in 2014, modified in 2014 to add one (1) Total Receiver - High Ash Flour, with a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year:

(1) Finished Product Handling & Storage, identified as emission unit AUMF-60629, including:
Enclosed headhouse distribution system, identified as Total Receiver - High Ash Flour Line, controlled by one (1) baghouse, identified as Filter #20, and exhausting to stack S7S HV-N;...

Twelve (12) finished product storage bins (one of the bins is divided into two), with a total [combined] storage capacity of 1,440 tons of flour, controlled by twelve (12) baghouses, identified as #22, #23, #24, #25, #26, #27, #28, #28, #29, #30, #31. Filters #22, #23, and #24, and #25 exhaust through a horizontal vent on the East side of the building (HV-S); Filter #25 exhausts to stack HV-N; Filters #27 and #28 exhaust through a horizontal vent on the East side of the building (HV-N); and Filters #29, #30, and #31 exhaust through stack S7N.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 PM, PM10 and PM2.5 PSD Minor Limits and FESOP Limits [326 IAC 2-8-4] [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(b) PM, PM10 and PM2.5 emissions shall not exceed the limits specified in the table below:
<table>
<thead>
<tr>
<th>Emissions Unit Description (Unit ID)</th>
<th>Process</th>
<th>Baghouse or Filter #</th>
<th>Stack ID</th>
<th>PM Limitation (lbs/hr)</th>
<th>PM10 Limitation (lbs/hr)</th>
<th>PM2.5 Limitation (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AUMF-60787</strong></td>
<td>Wheat Intake</td>
<td>1</td>
<td>S1</td>
<td>4.66</td>
<td>2.33</td>
<td>2.33</td>
</tr>
<tr>
<td></td>
<td>Pre-Cleaning</td>
<td>2</td>
<td>S2</td>
<td>3.95</td>
<td>2.45</td>
<td>2.45</td>
</tr>
<tr>
<td></td>
<td>Silo Chain Conveyor</td>
<td>3</td>
<td>S3</td>
<td>0.33</td>
<td>0.11</td>
<td>0.11</td>
</tr>
<tr>
<td><strong>AUMF-60770</strong></td>
<td>Cleanings</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Light Wheat Bin</td>
<td>17</td>
<td>S5</td>
<td>4.16</td>
<td>1.39</td>
<td>1.39</td>
</tr>
<tr>
<td></td>
<td>Unground Screenings Bin</td>
<td>18</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ground Screenings Bin</td>
<td>19</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>AUMF-60770</strong></td>
<td>Screening</td>
<td>6</td>
<td>S6</td>
<td>0.68</td>
<td>0.23</td>
<td>0.23</td>
</tr>
<tr>
<td><strong>AUMF-60769</strong></td>
<td>Mill-Pneumatic</td>
<td>7</td>
<td>S7</td>
<td>3.00</td>
<td>1.00</td>
<td>1.00</td>
</tr>
<tr>
<td></td>
<td>Mill-Pneumatic</td>
<td>8</td>
<td>S8</td>
<td>3.00</td>
<td>1.00</td>
<td>1.00</td>
</tr>
<tr>
<td></td>
<td>Mill-Aspiration</td>
<td>9</td>
<td>S9</td>
<td>2.48</td>
<td>0.83</td>
<td>0.83</td>
</tr>
<tr>
<td><strong>AUMF-60629</strong></td>
<td>Total Receiver</td>
<td>10</td>
<td>S10</td>
<td>0.48</td>
<td>0.16</td>
<td>0.16</td>
</tr>
<tr>
<td><strong>AUMF-60778</strong></td>
<td>Bran Bins</td>
<td>12</td>
<td>S12</td>
<td>0.93</td>
<td>0.46</td>
<td>0.46</td>
</tr>
<tr>
<td><strong>AUMF-60629 and AUMF-60778</strong></td>
<td>Total Receiver High Ash Flour Line</td>
<td>20</td>
<td>S7S</td>
<td>0.49</td>
<td>0.16</td>
<td>0.16</td>
</tr>
<tr>
<td></td>
<td>Start-Up Bin</td>
<td>21</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total Receiver High Ash Flour Line</td>
<td>26</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>RED-DOG Bin</td>
<td>43</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>AUMF-60629</strong></td>
<td>Airlock Hopper Clear Flour</td>
<td>22</td>
<td>HV-S</td>
<td>0.06</td>
<td>0.02</td>
<td>0.02</td>
</tr>
<tr>
<td></td>
<td>Airlock Hopper Cake Flour</td>
<td>23</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td></td>
<td>Airlock Hopper Patent Flour</td>
<td>24</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Airlock Hopper Whole Wheat Flour</td>
<td>25</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>AUMF-60629</strong></td>
<td>Airlock Hopper Flour to Packing</td>
<td>27</td>
<td>HV-N</td>
<td>0.09</td>
<td>0.03</td>
<td>0.03</td>
</tr>
<tr>
<td></td>
<td>Airlock Hopper Flour to Packing</td>
<td>28</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>AUMF-60629 and AUMF-60775</strong></td>
<td>Whole Wheat Bin</td>
<td>29</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>High Ash Bin</td>
<td>30</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cake Flour Bin</td>
<td>31</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td></td>
<td>Outload Bin</td>
<td>39</td>
<td>S7N</td>
<td>0.50</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td></td>
<td>Outload Bin</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Outload Bin</td>
<td>41</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Outload Bin</td>
<td>42</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>AUMF-60775</strong></td>
<td>Flour Line Sifter to Load Out Bins</td>
<td>33</td>
<td>N/A</td>
<td>0.06</td>
<td>0.02</td>
<td>0.02</td>
</tr>
<tr>
<td></td>
<td>Total Receiver Vacuum System</td>
<td>34</td>
<td></td>
<td>0.25</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td></td>
<td>Packer Aspiration Filter</td>
<td>35</td>
<td></td>
<td>0.18</td>
<td>0.06</td>
<td>0.06</td>
</tr>
<tr>
<td><strong>AUMF-60775</strong></td>
<td>Patent Packing Bin</td>
<td>36</td>
<td>S6-1</td>
<td>0.50</td>
<td>0.17</td>
<td>0.17</td>
</tr>
<tr>
<td></td>
<td>Patent Packing Bin</td>
<td>37</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>AUMF-60778</strong></td>
<td>Mill Feed Outload Bin</td>
<td>13</td>
<td>N/A</td>
<td>0.30</td>
<td>0.10</td>
<td>0.10</td>
</tr>
<tr>
<td>Emissions Unit Description (Unit ID)</td>
<td>Process</td>
<td>Baghouse or Filter #</td>
<td>Stack ID</td>
<td>Stack Limit PM (lbs/hr)</td>
<td>PM Limitation (lbs/hr)*</td>
<td>PM10 Limitation (lbs/hr)*</td>
</tr>
<tr>
<td>-------------------------------------</td>
<td>----------------------------------------------</td>
<td>----------------------</td>
<td>----------</td>
<td>-------------------------</td>
<td>-------------------------</td>
<td>---------------------------</td>
</tr>
<tr>
<td>AUMF-60787</td>
<td>Wheat Intake and Bins #17 and #18</td>
<td>01 S1</td>
<td></td>
<td>4.66</td>
<td>4.66</td>
<td>2.33</td>
</tr>
<tr>
<td></td>
<td>Pre-Cleaning and Bins #17 #18</td>
<td>02 S2</td>
<td></td>
<td>3.95</td>
<td>3.95</td>
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<tr>
<td></td>
<td>Silo Chain Conveyor and Bins #17 and #18</td>
<td>03 S3</td>
<td></td>
<td>0.33</td>
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<td>0.11</td>
</tr>
<tr>
<td>AUMF-60770</td>
<td>Cleanings</td>
<td>05 S5</td>
<td></td>
<td>1.04</td>
<td>1.04</td>
<td>0.35</td>
</tr>
<tr>
<td></td>
<td>Light Wheat Bin</td>
<td>17 S7S</td>
<td></td>
<td>3.49</td>
<td>3.12</td>
<td>1.04</td>
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<tr>
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<td>Unground Screenings Bin</td>
<td>18 S7S</td>
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<td>1.04</td>
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<td>Mill - Aspiration</td>
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<td>RED DOG Bin</td>
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<td>Airlock Hopper Patent Flour</td>
<td>24</td>
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<td>Airlock Hopper Whole Wheat Flour</td>
<td>25</td>
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<td>Airlock Hopper Flour to Packing</td>
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<tr>
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<td>Total Receiver High Ash Flour Line</td>
<td>20 HV-N</td>
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<td>0.23</td>
<td>0.12</td>
<td>0.04</td>
</tr>
<tr>
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<td></td>
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</tr>
<tr>
<td>AUMF-60629</td>
<td>Airlock Hopper Flour to Packing</td>
<td>27</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Airlock Hopper Flour to Packing</td>
<td>28</td>
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<tr>
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<td>Cake Flour Bin</td>
<td>31</td>
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<tr>
<td></td>
<td>Outload Bin</td>
<td>39</td>
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<tr>
<td></td>
<td>Outload Bin</td>
<td>40</td>
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<tr>
<td></td>
<td>Outload Bin</td>
<td>41</td>
<td></td>
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<tr>
<td>AUMF-60775</td>
<td>Flour Line Sifter to Load Out Bins</td>
<td>33 N/A</td>
<td></td>
<td>0.06</td>
<td>0.06</td>
<td>0.02</td>
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<tr>
<td></td>
<td>Total Receiver Vacuum System</td>
<td>34</td>
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<td>0.25</td>
<td>0.25</td>
<td>0.08</td>
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<td></td>
<td>Packer Aspiration Filter</td>
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<td>0.18</td>
<td>0.18</td>
<td>0.06</td>
</tr>
<tr>
<td>AUMF-60775</td>
<td>Patent Packing Bin</td>
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<td>0.50</td>
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<tr>
<td></td>
<td>Patent Packing Bin</td>
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<tr>
<td>AUMF 60778</td>
<td>Mill Feed Outload Bin</td>
<td>13 N/A</td>
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<td>0.30</td>
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<tr>
<td></td>
<td>Mill Feed Outload Bin</td>
<td>14</td>
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</tr>
<tr>
<td></td>
<td>Mill Feed Outload Bin</td>
<td>15</td>
<td></td>
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<td></td>
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<tr>
<td></td>
<td>Mill Feed Outload Bin</td>
<td>16</td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
*Based on grain loading and maximum throughput*

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

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

...  

**D.1.5 Testing Requirements**  
[326 IAC 2-8-5(a)(1), (4)[326 IAC 2-1.1-11]

(a) No later than five (5) years from the most recent valid compliance demonstration, in order to demonstrate compliance with Condition D.1.1(b), the Permittee shall perform PM, PM10, and PM2.5 testing for one (1) of the control devices in each group-stacks within each Group for Groups 1 through Group 4 as specified in the following table, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing of any individual emission control device unit within a group shall not be repeated until each emission unit control device within every group has been tested. The control device tested within a Group shall be the stack one in which the longest amount of time has elapsed since its previous test. In addition to these requirements, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable particulate matter.

<table>
<thead>
<tr>
<th>Group ID</th>
<th>Control Devices</th>
</tr>
</thead>
<tbody>
<tr>
<td>Group 1</td>
<td>Filter 01 (grain loading 0.01 gr/dscf)</td>
</tr>
<tr>
<td>Group 2</td>
<td>Filter 02 (grain loading 0.02 gr/dscf)</td>
</tr>
<tr>
<td>Group 3</td>
<td>Filters 03, 05, 06, 07, 08, 09, 10, 12, 13, 14, 15, 16, 17, 18, 19, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 33, 34, 35, 36, 37 (grain loading 0.03 gr/dscf)</td>
</tr>
</tbody>
</table>
### Emission Unit Groupings

<table>
<thead>
<tr>
<th>Group</th>
<th>Emission Unit ID</th>
<th>Stack ID</th>
<th>Emission Unit Description/ Process</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Group 1</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>AUMF-60787</td>
<td>S2</td>
<td>Pre-cleaning</td>
</tr>
<tr>
<td></td>
<td>AUMF-60769</td>
<td>S7</td>
<td>Mill House Pneumatic</td>
</tr>
<tr>
<td></td>
<td>AUMF-60769</td>
<td>S8</td>
<td>Mill House Pneumatic</td>
</tr>
<tr>
<td></td>
<td>AUMF-60769</td>
<td>S9</td>
<td>Mill House Pneumatic</td>
</tr>
<tr>
<td><strong>Group 2</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>AUMF-60629 &amp; AUMF-60775</td>
<td>S7N</td>
<td>Multiple</td>
</tr>
<tr>
<td></td>
<td>AUMF-60778</td>
<td>S12</td>
<td>Bran Bins</td>
</tr>
<tr>
<td><strong>Group 3</strong></td>
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<tr>
<td></td>
<td>AUMF-60775</td>
<td>S5-1</td>
<td>Finished Product Storage</td>
</tr>
<tr>
<td></td>
<td>AUMF-60770</td>
<td>S6</td>
<td>Cleaning House Screenings</td>
</tr>
<tr>
<td></td>
<td>AUMF-60629 &amp; AUMF-60775</td>
<td>S7S</td>
<td>Multiple</td>
</tr>
<tr>
<td></td>
<td>AUMF-60775</td>
<td>S10</td>
<td>Total Receiver</td>
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<td><strong>Group 4</strong></td>
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<td>AUMF-60787</td>
<td>S3</td>
<td>Silo Chain Conveyor</td>
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<td>HV-S</td>
<td>Finished Product Handling</td>
</tr>
<tr>
<td></td>
<td>AUMF-60629</td>
<td>HV-N</td>
<td>Finished Product Handling</td>
</tr>
</tbody>
</table>

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 3, 2020.

The operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 029-43348-00045. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

### IDEM Contact

(a) If you have any questions regarding this permit, please contact L. David Cohen, 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) 233-9327 or (800) 451-6027, and ask for L. David Cohen or (317) 233-9327.

(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.1: Emissions Calculations

#### Source-Wide Emission Summary

**Company Name:** Whitewater Mill, LLC  
**Source Address:** 707 Harrison Brookville Road, West Harrison, IN 47060  
**Operating Permit No.:** F029-40814-00045  
**Significant Permit Revision No.:** 029-43348-00045  
**Permit Writer:** L. David Cohen

### Unlimited/Uncontrolled Potential to Emit (tons/year)

<table>
<thead>
<tr>
<th>Process</th>
<th>Maximum Throughput Rate (tons/hr)</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Whole Grain Receiving</td>
<td>550</td>
<td>0.18</td>
<td>0.069</td>
<td>0.010</td>
<td>433.62</td>
<td>142.13</td>
<td>24.09</td>
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<tr>
<td>Whole Grain Receiving</td>
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<td>0.032</td>
<td>0.0027</td>
<td>0.0033</td>
<td>77.09</td>
<td>18.79</td>
<td>3.13</td>
<td>-</td>
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<tr>
<td>Grain Handling, Pre-Cleaning</td>
<td>490</td>
<td>0.061</td>
<td>0.034</td>
<td>0.0058</td>
<td>130.92</td>
<td>27.97</td>
<td>12.45</td>
<td>-</td>
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<tr>
<td>Storage</td>
<td>490</td>
<td>0.025</td>
<td>0.0063</td>
<td>0.0011</td>
<td>53.86</td>
<td>13.82</td>
<td>2.36</td>
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<tr>
<td>Whole Grain Receiving</td>
<td>550</td>
<td>0.075</td>
<td>0.019</td>
<td>0.0032</td>
<td>9.86</td>
<td>2.50</td>
<td>0.42</td>
<td>-</td>
<td>-</td>
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<tr>
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<td>25</td>
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<td></td>
<td>7,068.00</td>
<td>3,832.50</td>
<td>3,832.50</td>
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<td>-</td>
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<td>Finished Product Handling &amp; Storage</td>
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<td>0.0033</td>
<td>0.0006</td>
<td>0.0008</td>
<td>7.36</td>
<td>1.93</td>
<td>1.93</td>
<td>-</td>
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<tr>
<td>Bulk Plant and Finished Product Loadout</td>
<td>550</td>
<td>0.0049</td>
<td>0.0008</td>
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<td>207.17</td>
<td>69.86</td>
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<td>Byproducts and Mill Feed Storage, Handling, And Loadout</td>
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<td>0.0008</td>
<td>7.65</td>
<td>1.93</td>
<td>1.93</td>
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<tr>
<td>Paved Roads</td>
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</tbody>
</table>

Total of Entire Source including Fugitive Emissions: 8,593 4,156 3,891 0.00 0.00 0.00 0.00 0.0001

Total of Entire Source excluding Fugitive Emissions: 8,600 4,157 3,891 0.00 0.00 0.00 0.00 0.0001

### Methodology

Emission Factors are from AP 42, Chapter 9.9.1

Emissions (tons/yr) = Throughput (tons/hr) x Emission Factor (lb/ton) * 8760 h/yr / 2000 lb/ton
**TSD Appendix A Page 2 of 5, TSD App. A**

**Company Name:** Whitewater Mill, LLC  
**Source Address:** 707 Harrison Brookville Road, West Harrison, IN 47060  
**Operating Permit No.:** F029-40814-00045  
**Significant Permit Revision No.:** 029-43348-00045  
**Permit Writer:** L. David Cohen

### Limited stack emissions

<table>
<thead>
<tr>
<th>Emission Unit Description</th>
<th>Process</th>
<th>Stack Limit (lbs/hr)</th>
<th>Stack Limit (lbs/hr)</th>
<th>Stack Limit (lbs/hr)</th>
<th>Baghouse or Filter ID</th>
<th>Stack ID</th>
<th>PM Limitation (lbs/hr)</th>
<th>PM10 Limitation (lbs/hr)</th>
<th>PM2.5 Limitation (lbs/hr)</th>
<th>PM Limitation (tons/yr)</th>
<th>PM10 Limitation (tons/yr)</th>
<th>PM2.5 Limitation (tons/yr)</th>
<th>SO2 (tons/yr)</th>
<th>NOx (tons/yr)</th>
<th>VOC (tons/yr)</th>
<th>CO (tons/yr)</th>
<th>Total HAPs (tons/yr)</th>
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</thead>
<tbody>
<tr>
<td>Wheat Intake and Bins #17 and #18</td>
<td>4.66</td>
<td>2.33</td>
<td>2.33</td>
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<td>S1</td>
<td>4.66</td>
<td>3.33</td>
<td>2.33</td>
<td>20.42</td>
<td>15.21</td>
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<td>15.21</td>
<td>10.21</td>
<td>20.42</td>
<td>15.21</td>
<td>10.21</td>
</tr>
<tr>
<td>Pre-Cleaning and Bins #17 and #18</td>
<td>3.88</td>
<td>2.46</td>
<td>2.46</td>
<td>2</td>
<td>S2</td>
<td>3.88</td>
<td>2.46</td>
<td>2.46</td>
<td>17.39</td>
<td>12.73</td>
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<td>12.73</td>
<td>8.73</td>
<td>17.39</td>
<td>12.73</td>
<td>8.73</td>
</tr>
<tr>
<td>Silo Chute Conveyors and Bins #17 and #18</td>
<td>0.33</td>
<td>0.11</td>
<td>0.11</td>
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<td>S3</td>
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<td>1.47</td>
<td>0.96</td>
<td>0.96</td>
<td>1.47</td>
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<td>0.96</td>
<td>1.47</td>
<td>0.96</td>
<td>0.96</td>
</tr>
</tbody>
</table>

### Limited uncontrolled emissions (tons/year)

<table>
<thead>
<tr>
<th>Process</th>
<th>PM (ton/yr)</th>
<th>PM10 (ton/yr)</th>
<th>PM2.5 (ton/yr)</th>
<th>SO2 (ton/yr)</th>
<th>NOx (ton/yr)</th>
<th>VOC (ton/yr)</th>
<th>CO (ton/yr)</th>
<th>Total HAPs (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wheat Grain Receiving uncaptured truck</td>
<td>9.86</td>
<td>3.23</td>
<td>1.00</td>
<td>1.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Wheat Grain Receiving uncaptured railcar</td>
<td>1.73</td>
<td>0.43</td>
<td>0.07</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Total PTE of Entire Source Excluding Fugitive Emissions = Limited Stack emissions (tons/year) + Limited Uncaptured emissions (tons/year) + Limited Throughput (tons/year) x Uncontrolled Emission Factor (lbs/ton) x 1/2000 (tons/ton) x 0.5 (50% fugitive) x 1/2000 (tons/ton)

Total PTE of Entire Source Excluding Fugitive Emissions = 124.09 + 46.49 + 46.47 = 216.55 (tons/yr)  
Total PTE of Entire Source Excluding Fugitive Emissions = 112.46 (tons/yr)

For grain receiving truck and railcar, it is assumed that 50% of the uncontrolled emissions are uncaptured.
### Appendix A.1: Emissions Calculations

#### Source-Wide Limited PM Emission Summary

**Company Name:** Whitewater Mill, LLC  
**Source Address:** 707 Harrison Brookville Road, West Harrison, IN 47060  
**Operating Permit No.:** F229-49814-00045  
**Significant Permit Revision No.:** 029-43346-00045  
**Permit Writer:** L. David Cohen

#### Emissions Unit Description (Unit ID)  
<table>
<thead>
<tr>
<th>Process</th>
<th>Stack ID</th>
<th>Baghouse or Filter #</th>
<th>Limited PM (lb/hr)</th>
<th>Limited PM (tons/yr)</th>
<th>Limited PM (lb/hr)</th>
<th>Limited PM (tons/yr)</th>
<th>Limited PM (lb/hr)</th>
<th>Limited PM (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wheat Intake and Bins #17 and #18</td>
<td>S1</td>
<td>01</td>
<td>0.02</td>
<td>770</td>
<td>27,193</td>
<td>4.66</td>
<td>20.42</td>
<td>2.33</td>
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<tr>
<td>Pre-Cleaning and Bins #17 and #18</td>
<td>S2</td>
<td>02</td>
<td>0.01</td>
<td>1,304</td>
<td>46,051</td>
<td>3.95</td>
<td>17.29</td>
<td>2.45</td>
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<tr>
<td>Silo Chain Conveyor and Bins #17 and #18</td>
<td>S3</td>
<td>03</td>
<td>0.03</td>
<td>36</td>
<td>1,271</td>
<td>0.33</td>
<td>1.43</td>
<td>0.11</td>
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<tr>
<td>Cleaning (AUMP-60770)</td>
<td>S4</td>
<td>04</td>
<td>0.03</td>
<td>75</td>
<td>2,669</td>
<td>0.68</td>
<td>2.98</td>
<td>0.33</td>
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<td>Light Wheat Bin</td>
<td>S5</td>
<td>05</td>
<td>0.03</td>
<td>115</td>
<td>4,044</td>
<td>1.04</td>
<td>4.55</td>
<td>0.35</td>
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<tr>
<td>Ugr. Screenings Bin</td>
<td>S6</td>
<td>06</td>
<td>0.03</td>
<td>115</td>
<td>4,044</td>
<td>1.04</td>
<td>4.55</td>
<td>0.35</td>
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<tr>
<td>Ground Screenings Bin</td>
<td>S7</td>
<td>07</td>
<td>0.03</td>
<td>330</td>
<td>11,654</td>
<td>3.00</td>
<td>13.13</td>
<td>1.00</td>
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<tr>
<td>Mill - pneumatic</td>
<td>S8</td>
<td>08</td>
<td>0.03</td>
<td>330</td>
<td>11,654</td>
<td>3.00</td>
<td>13.13</td>
<td>1.00</td>
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<tr>
<td>Mill - aspiration</td>
<td>S9</td>
<td>09</td>
<td>0.03</td>
<td>330</td>
<td>11,654</td>
<td>3.00</td>
<td>13.13</td>
<td>1.00</td>
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<tr>
<td>Finished Product Handling (AUMP-60829)</td>
<td>S10</td>
<td>10</td>
<td>0.03</td>
<td>14</td>
<td>477</td>
<td>0.12</td>
<td>0.54</td>
<td>0.04</td>
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<tr>
<td>Stiel Up Bin</td>
<td>S11</td>
<td>11</td>
<td>0.03</td>
<td>14</td>
<td>477</td>
<td>0.12</td>
<td>0.54</td>
<td>0.04</td>
</tr>
<tr>
<td>Airlock Hopper CLEAR Flour</td>
<td>S12</td>
<td>12</td>
<td>0.03</td>
<td>2</td>
<td>62</td>
<td>0.02</td>
<td>0.07</td>
<td>0.01</td>
</tr>
<tr>
<td>Airlock Hopper CAKE Flour</td>
<td>S13</td>
<td>13</td>
<td>0.03</td>
<td>2</td>
<td>62</td>
<td>0.02</td>
<td>0.07</td>
<td>0.01</td>
</tr>
<tr>
<td>Airlock Hopper PATENT Flour</td>
<td>S14</td>
<td>14</td>
<td>0.03</td>
<td>2</td>
<td>62</td>
<td>0.02</td>
<td>0.07</td>
<td>0.01</td>
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<tr>
<td>Airlock Hopper WHOLE WHEAT FL.</td>
<td>S15</td>
<td>15</td>
<td>0.03</td>
<td>2</td>
<td>62</td>
<td>0.02</td>
<td>0.07</td>
<td>0.01</td>
</tr>
<tr>
<td>Total Receiver HIGH ASH FL.</td>
<td>S16</td>
<td>16</td>
<td>0.03</td>
<td>53</td>
<td>1,872</td>
<td>0.48</td>
<td>2.11</td>
<td>0.16</td>
</tr>
<tr>
<td>Airlock Hopper FLOUR To Packing</td>
<td>S17</td>
<td>17</td>
<td>0.03</td>
<td>5</td>
<td>177</td>
<td>0.05</td>
<td>0.20</td>
<td>0.02</td>
</tr>
<tr>
<td>Airlock Hopper FLOUR To Packing WHOLE WHEAT Bin</td>
<td>S18</td>
<td>18</td>
<td>0.03</td>
<td>8</td>
<td>277</td>
<td>0.07</td>
<td>0.31</td>
<td>0.02</td>
</tr>
<tr>
<td>Airlock Hopper HIGH ASH Bin</td>
<td>S19</td>
<td>19</td>
<td>0.03</td>
<td>8</td>
<td>277</td>
<td>0.07</td>
<td>0.31</td>
<td>0.02</td>
</tr>
<tr>
<td>CANK FLOUR Bin</td>
<td>S20</td>
<td>20</td>
<td>0.03</td>
<td>8</td>
<td>277</td>
<td>0.07</td>
<td>0.31</td>
<td>0.02</td>
</tr>
<tr>
<td>Finished Product Storage (AUMP-60775)</td>
<td>S21</td>
<td>21</td>
<td>0.03</td>
<td>53</td>
<td>1,872</td>
<td>0.48</td>
<td>2.11</td>
<td>0.16</td>
</tr>
<tr>
<td>Total Receiver</td>
<td>S22</td>
<td>22</td>
<td>0.03</td>
<td>27</td>
<td>954</td>
<td>0.25</td>
<td>1.07</td>
<td>0.08</td>
</tr>
<tr>
<td>Flour line filter to load out bins</td>
<td>S23</td>
<td>23</td>
<td>0.03</td>
<td>27</td>
<td>954</td>
<td>0.25</td>
<td>1.07</td>
<td>0.08</td>
</tr>
<tr>
<td>Total Receiver Vacuum System</td>
<td>S24</td>
<td>24</td>
<td>0.03</td>
<td>28</td>
<td>971</td>
<td>0.25</td>
<td>1.09</td>
<td>0.08</td>
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<tr>
<td>PATENT packing bin</td>
<td>S25</td>
<td>25</td>
<td>0.03</td>
<td>28</td>
<td>971</td>
<td>0.25</td>
<td>1.09</td>
<td>0.08</td>
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<tr>
<td>OUTLOAD bin</td>
<td>S26</td>
<td>26</td>
<td>0.03</td>
<td>8</td>
<td>277</td>
<td>0.07</td>
<td>0.31</td>
<td>0.02</td>
</tr>
<tr>
<td>OUTLOAD bin</td>
<td>S27</td>
<td>27</td>
<td>0.03</td>
<td>8</td>
<td>277</td>
<td>0.07</td>
<td>0.31</td>
<td>0.02</td>
</tr>
<tr>
<td>OUTLOAD bin</td>
<td>S28</td>
<td>28</td>
<td>0.03</td>
<td>8</td>
<td>277</td>
<td>0.07</td>
<td>0.31</td>
<td>0.02</td>
</tr>
<tr>
<td>OUTLOAD bin</td>
<td>S29</td>
<td>29</td>
<td>0.03</td>
<td>8</td>
<td>277</td>
<td>0.07</td>
<td>0.31</td>
<td>0.02</td>
</tr>
<tr>
<td>OUTLOAD bin</td>
<td>S30</td>
<td>30</td>
<td>0.03</td>
<td>8</td>
<td>277</td>
<td>0.07</td>
<td>0.31</td>
<td>0.02</td>
</tr>
<tr>
<td>OUTLOAD bin</td>
<td>S31</td>
<td>31</td>
<td>0.03</td>
<td>8</td>
<td>277</td>
<td>0.07</td>
<td>0.31</td>
<td>0.02</td>
</tr>
<tr>
<td>Byproducts &amp; Mill Feed Handling (AUMP-6708)</td>
<td>S32</td>
<td>32</td>
<td>0.03</td>
<td>153</td>
<td>5,403</td>
<td>0.93</td>
<td>4.06</td>
<td>0.46</td>
</tr>
<tr>
<td>Brien bins</td>
<td>S33</td>
<td>33</td>
<td>0.03</td>
<td>8</td>
<td>291</td>
<td>0.07</td>
<td>0.33</td>
<td>0.02</td>
</tr>
<tr>
<td>Mill Feed Outflow</td>
<td>S34</td>
<td>34</td>
<td>0.03</td>
<td>8</td>
<td>291</td>
<td>0.07</td>
<td>0.33</td>
<td>0.02</td>
</tr>
<tr>
<td>Mill Feed Outflow</td>
<td>S35</td>
<td>35</td>
<td>0.03</td>
<td>8</td>
<td>291</td>
<td>0.07</td>
<td>0.33</td>
<td>0.02</td>
</tr>
<tr>
<td>MILL Feed Outflow</td>
<td>S36</td>
<td>36</td>
<td>0.03</td>
<td>8</td>
<td>291</td>
<td>0.07</td>
<td>0.33</td>
<td>0.02</td>
</tr>
<tr>
<td>RED DOG bin</td>
<td>S37</td>
<td>37</td>
<td>0.03</td>
<td>14</td>
<td>477</td>
<td>0.12</td>
<td>0.54</td>
<td>0.04</td>
</tr>
</tbody>
</table>

**Notes**  
- Total emissions  
  - n/a = not applicable. Unit exhausts inside the building.  
  - 1) Grain loading rate is based on calculations for permit no. 029-34507-00045  
  - 2) Grain loading rate provided by source and is based on recent stack testing  

**Methodology**

- Gas or Air Flow Rate (cubic feet per minute (ft³/min)) = Gas or Air Flow Rate (cubic meters per minute (m³/min)) * 35.315 (ft³/m³)  
- Limited Emissions (lb/hr) - Guaranteed Filter Discharge Loading (grains/dscf) x Gas Flow Rate (ft³/min) x 60 (min/hr) / 7000 (lbs/ton)  
- Controlled Emissions (tons/yr) - Controlled Emissions (lb/hr) x 8760 (hrs/yr) / 2000 (lbs/ton)  
- Total Emissions (tons/yr) - Sum of Controlled Emissions (tons/yr)
Appendix A.1: Emissions Calculations
Flour Bleaching Operation

<table>
<thead>
<tr>
<th>Material</th>
<th>Maximum Material Usage (oz Cl gas/lbs flour)</th>
<th>Maximum Material Usage (oz Cl gas/ton flour)</th>
<th>Maximum Throughput of Flour (tons/yr)</th>
<th>Maximum Material Usage (oz Cl gas/year)</th>
<th>Percent Chlorine Emitted from Process (%)</th>
<th>Potential to emit Chlorine (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chlorine gas</td>
<td>0.02</td>
<td>40</td>
<td>219,000</td>
<td>8,760,000</td>
<td>0.01%</td>
<td>9.20E-05</td>
</tr>
</tbody>
</table>

Notes
Total emissions based on rated capacity at 8,760 hours/year.
Whitewater Mill LLC indicates that the amount of chlorine gas added to the process (i.e., the usage rate) is approx. 2 oz. per 100 lbs of finished flour. The process is specifically designed to consume more than 99.99% of the gas.
It is assumed that the chlorine gas used in the process is 100% HAP.

Constants:
One (1) Liter (L) = 33.81402 ounces (oz)
One (1) pound (lb) = 453.59232 grams (g)
Density of chlorine gas = 3.2204 grams/Liter (g/L) at 0 °C, 1 atmosphere (14.7 psi @ sea lvl).


Methodology
Maximum Material Usage (oz Cl/lbs flour) = [2 oz. chlorine / 100 lbs of finished flour]
Maximum Material Usage (oz Cl gas/ton flour) = [Maximum Material Usage (oz Cl/lbs flour) * 2000 lbs/1 ton]
Maximum Material Usage (oz Cl gas/year) = [Maximum Material Usage (oz Cl gas/ton flour) * Maximum Throughput of Flour (tons/yr)]
Percent Chlorine Emitted from Process (%) = [1 - (99.99% of Chlorine Gas Consumed in Process)/100%]
PTE of Chlorine (tons/yr) = [(Maximum Material Usage (oz Cl gas/year))* (1 L/33.81402 oz) * (Density of Chlorine Gas (g/L) * (1 lb/ (453.59232 g) * (1
Appendix A.1: Emissions Calculations

Paved Roads

Company Name: Whitewater Mill, LLC
Source Address: 707 Harrison Brookville Road, West Harrison, IN 47060
Operating Permit No.: F029-40814-00045
Significant Permit Revision No.: 029-43348-00045
Permit Writer: L. David Cohen

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>Maximum trips per day (trip/day)</th>
<th>Maximum Vehicle Weight Loaded (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant)</td>
<td>30.0</td>
<td>1.0</td>
<td>50.0</td>
<td>40.0</td>
<td>2,000.0</td>
<td>850</td>
<td>0.107</td>
<td>8.9</td>
</tr>
<tr>
<td>Vehicle (leaving plant)</td>
<td>30.0</td>
<td>1.0</td>
<td>50.0</td>
<td>15.0</td>
<td>750.0</td>
<td>850</td>
<td>0.107</td>
<td>8.9</td>
</tr>
</tbody>
</table>

Totals: 100.0 2,750.0 16.1 5,875.9

Average Vehicle Weight Per Trip = \[ \frac{27.5 \text{ tons/trip}}{100.0} \]
Average Miles Per Trip = \[ \frac{8.5 \text{ miles/trip}}{100.0} \]

Unmitigated Emission Factor, \( \text{EF} \) = \[ k \times (sL)^{0.91} \times W^{1.02} \]

where \( k = \frac{0.011}{0.00022} \times \frac{0.00054}{\text{lb/VMT}} \) = particle size multiplier (AP-42 Table 13.2.1-1)
\( W = 27.5 \text{ tons} \) = average vehicle weight (provided by source)
\( sL = 9.7 \text{ g/m}^2 \) = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, \( \text{Ex} = \text{EF} \times [1 - (p/4N)] \)

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

Mitigated Emission Factor, \( \text{Ex} = \frac{2.555}{0.1255} \times \frac{0.147}{0.1255} \times \frac{0.1147}{0.1255} \) lb/mile

Dust Control Efficiency = 0% (pursuant to control measures outlined in fugitive dust control plan)

<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 PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
<th>Controlled PTE of PM10 (tons/yr)</th>
<th>Controlled PTE of PM2.5 (tons/yr)</th>
<th>Controlled PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant)</td>
<td>3.75</td>
<td>0.75</td>
<td>0.18</td>
<td>3.43</td>
<td>0.69</td>
<td>0.17</td>
<td>3.43</td>
<td>0.69</td>
</tr>
<tr>
<td>Vehicle (leaving plant)</td>
<td>3.75</td>
<td>0.75</td>
<td>0.18</td>
<td>3.43</td>
<td>0.69</td>
<td>0.17</td>
<td>3.43</td>
<td>0.69</td>
</tr>
</tbody>
</table>

Totals: 7.51 1.50 0.37 6.87 1.37 0.34 6.87 1.37 0.34

Methodology
Total emissions based on rated capacity at 8,760 hours/year.
Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \times [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Average Vehicle Weight Per Trip (ton/trip) = \[ \frac{\text{SUM}[\text{Maximum one-way miles (miles/day)} / \text{SUM}[\text{Maximum trips per day (trip/day)]]]}{\text{SUM}[\text{Maximum one-way miles (miles/day)} / \text{SUM}[\text{Maximum trips per day (trip/day)]]} \]

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit
January 28, 2021

John Lumpkin
Whitewater Mill, LLC
707 Harrison-Brookville Road
West Harrison, IN 47060

Re: Public Notice
Whitewater Mill, LLC
Permit Level: FESOP - Significant Permit Modification
Permit Number: 029-43348-00045

Dear Mr. John Lumpkin:

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 43348

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 Lawrenceburg Public Library-North Dearborn Branch, 25969 Dole Road in West Harrison, IN 47060. 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 L. David Cohen, 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 3-9327 or dial (317) 233-9327.

Sincerely,

Kathy Bourquein

Kathy Bourquein
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover Letter access via website 8/10/2020
January 28, 2021

To: Lawrenceburg Public Library-North Dearborn Branch

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: Whitewater Mill, LLC
Permit Number: 029-43348-00045

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 28, 2021
Whitewater Mill, LLC
029-43348-00045

Dear Concerned Citizen(s):

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

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

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

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

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

Enclosure
PN AAA Cover Letter 2/28/2020
<table>
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<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
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<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
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<td>1</td>
<td></td>
<td>John Lumpkin Whitewater Mill LLC 707 Harrison-Brookville Rd West Harrison IN 47060 (Source CAATS)</td>
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<td>Michael &amp; Monica Ramsey 9931 Old SR 56 Aurora IN 47001 (Affected Party)</td>
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<td></td>
<td>Dearborn County Commissioner 215 B West High Street Lawrenceburg IN 47025 (Local Official)</td>
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<td>Dearborn County Health Department 165 Mary St Lawrenceburg IN 47025 (Health Department)</td>
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<td>Mr. John Teaney P.O. Box 494 10837 Aurora IN 47001 (Affected Party)</td>
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<td>Ken &amp; Jackie Greive 4685 E. Laughery Creek Road Aurora IN 47001 (Affected Party)</td>
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<td>Marlin M. Guss, Jr. 10400 Millstone Dr, P.O. Box 272 Aurora IN 47001 (Affected Party)</td>
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<td>Mrs. Shirley Greive 4412 E. Laughery Aurora IN 47001 (Affected Party)</td>
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<td>Sam &amp; Nancy Valone 3826 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)</td>
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<td>Mrs. Melanie Bushorn 4172 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)</td>
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<td></td>
<td>West Harrison Town Council 100 Railroad Ave, West Harrison IN 47060 (Local Official)</td>
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<td>Lawrenceburg Public Library Dist-N Dearborn Branch 25969 Dole Rd West Harrison IN 47060 (Library)</td>
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<td>Chandra Mattingly Rising Sun Recorder 126 W High St Lawrenceburg IN 47025 (Affected Party)</td>
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**Total number of pieces Listed by Sender**

**Total number of Pieces Received at Post Office**

**Postmaster, Per (Name of Receiving employee)**

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See *Domestic Mail Manual* R900, S913, and S921 for limitations of coverage on insured and COD mail. See *International Mail Manual* for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.