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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

To: Interested Parties

Date: March 17, 2020

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

Source Name: Midwest Fertilizer Company, LLC

Permit Level: Title V – Administrative Amendment

Permit Number: 129-42647-00059

Source Location: Intersection of Old SR 69 and Mackey Ferry Road East
Mt. Vernon, IN 47620

Type of Action Taken: Changes that are administrative in nature

Notice of Decision: Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: http://www.in.gov/apps/idem/caats/
To view the document, choose Search Option **by Permit Number**, then enter permit 42647.

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

(continues on next page)

If you would like to request a paper copy of the permit document, please contact IDEM's Office of Records Management:

IDEM - Office of Records Management
Indiana Government Center North, Room 1207
100 North Senate Avenue
Indianapolis, IN 46204
Phone: (317) 232-8667
Fax: (317) 233-6647
Email: IDEMFILEROOM@idem.in.gov

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room N103, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

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Commissioner

March 17, 2020

Mr. J. Leslie Wright
Midwest Fertilizer Company LLC
101 West Ohio Street, Suite 1010
Indianapolis, IN 46204

Re: 129-42647-00059
Administrative Amendment to
Part 70 Operating Permit Renewal No. T129-40329-00059

Dear Dear Mr. Wright:

Midwest Fertilizer Company LLC was issued Part 70 Operating Permit Renewal No. T129-40329-00059 on June 18, 2019 for a stationary nitrogen fertilizer manufacturing facility located at the Intersection of Old SR 69 and Mackey Ferry Road East, Mt. Vernon, IN 47620. On March 2, 2020, the Office of Air Quality (OAQ) received an application from the source requesting that the commencement of construction time period for the source be extended to September 23, 2021.

IDEM OAQ, considered the information provided by Midwest Fertilizer Company LLC for the extension request. After careful evaluation of all the information presented in this request, IDEM determined that a satisfactory showing was made to justify an additional eighteen (18) month extension for the project without the need for substantive changes to the existing construction approval. This determination was made as part of the Review Request No.: 129-42626-00059.

Accordingly, to incorporate this determination into Midwest Fertilizer Company LLC's existing Part 70 Operating Permit Renewal No. T129-40329-00059, Condition B.2- Revocation of Permit must be amended to extend the deadline date for the commencement of construction until September 23, 2021.

For a permit issued under the provisions of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD), approval to construct is subject the provision of 326 IAC 2-2-8(a). Condition B.2 - Revocation of Permits has been further amended to clarify the construction authorization under 326 IAC 2-2-8.

....

B.2 Revocation of Permits [326 IAC 2-2-8]

Pursuant to 326 IAC 2 2 8(a)(1), this permit to construct shall expire if construction is not commenced on or before ~~March 23, 2020~~**September 23, 2021** or if construction is discontinued for a period of eighteen (18) months or more.

....

All other conditions of the permit shall remain unchanged and in effect.

Please find attached the entire Part 70 Operating Permit Renewal as amended. The permit references the below listed attachment(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this amendment:

Attachment A NSPS for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db

Attachment B	NSPS for Nitric Acid Plants for Which Construction, Reconstruction, or Modification Commences after October 14, 2011, 40 CFR 60, Subpart Ga
Attachment C	NSPS for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commences after November 7, 2006, 40 CFR 60, Subpart VVa
Attachment D	NSPS for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII
Attachment E	NESHAP for Benzene Waste Operations, 40 CFR 61, Subpart FF
Attachment F	NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63, Subpart ZZZZ

Previously issued approvals for this source containing these attachments are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Previously issued approvals for this source are also available via IDEM's Virtual File Cabinet (VFC). Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

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

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 Tamara Havics, 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) 233-5334 or (800) 451-6027, and ask for Tamara Havics or (317) 232-8219.

Sincerely,

Jenny Acker, Chief
Permits Branch
Office of Air Quality

Attachment(s): Updated Permit

cc: File - Posey County
Posey County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Southwest Regional Office

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Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Midwest Fertilizer Company LLC
Intersection Old SR 69 and Mackey Ferry Road
Mt. Vernon, Indiana 47620

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T129-40329-00059 Master Agency Interest ID: 106847	
Issued by: Original signed by: Brian Williams, Section Chief Permits Branch, Office of Air Quality	Issuance Date: June 18, 2019 Expiration Date: June 18, 2024

Administrative Amendment No.: 129-42647-00059	
Issued by: Jenny Acker, Branch Chief Permits Branch, Office of Air Quality	Issuance Date: March 17, 2020 Expiration Date: June 18, 2024

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Attachment C	**NSPS for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commences after November 7, 2006, 40 CFR 60, Subpart VVa**
Attachment D	**NSPS for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII**
Attachment E	**NESHAP for Benzene Waste Operations, 40 CFR 61, Subpart FF**
Attachment F	**NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63, Subpart ZZZZ**

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary nitrogen fertilizer manufacturing facility.

Source Address:	Intersection Old SR 69 and Mackey Ferry Road East Mt. Vernon, Indiana 47620
General Source Phone Number:	(317) 625-8315
SIC Code:	2873 [Nitrogenous Fertilizers]
County Location:	Posey
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

(a) One (1) 2,400 metric ton per day (MTPD) ammonia plant consisting of the following emission units:

(1) One (1) 950.64 MMBtu/hr reformer furnace, identified as emission unit EU-001, approved in 2014 for construction, and modified in 2019, combusting a combination of process gas and natural gas, with NO_x emissions controlled by low NO_x burners and a Selective Catalytic Reduction (SCR) Unit, identified as SCR-1, NO_x CEMS and exhausting to stack S-001.

(2) One (1) CO_2 purification process, identified as emission unit EU-003, approved in 2014 for construction, emissions are uncontrolled, exhausting to stack S-003.

(b) One (1) 70 MMBtu/hr natural gas-fired startup heater, identified as emission unit EU-002, approved in 2016 for construction, emissions are uncontrolled, exhausting to stack S-002.

(c) One (1) 1.12 MMBtu/hr Front End Flare, using a natural gas-fired pilot, identified as emission unit EU-017, approved in 2016 for construction, used to control intermittent process gas emissions from maintenance, startup, shutdown, and malfunctions, exhausting to stack S-017.

(d) One (1) 1.12 MMBtu/hr Back End Flare, using a natural gas-fired pilot, identified as emission unit EU-018, approved in 2016 for construction, exhausting to stack S-018.

(e) One (1) 1,320 metric ton per day Urea Granulation Unit, identified as EU-008, approved in 2016 for construction, particulate emissions are controlled by a high efficiency wet scrubber, exhausting to stack S-008.

[Under 40 CFR 60, Subpart VVa, this is an affected emission unit]

(f) One (1) 1,840 metric ton per day Nitric Acid Plant, where production is based on 100% by weight acid equivalent solution, identified as emission unit EU-009, approved in 2014 for construction, NO_x and N_2O are controlled by a catalytic reactor for N_2O control and Selective Catalytic Reduction (SCR) for NO_x control, identified as SCR-2, NO_x CEMS, exhausting to stack S-009.

[Under 40 CFR 60, Subpart Ga, this is an affected emission unit]

(g) Three (3) natural gas-fired auxiliary boilers, identified as emission units EU-012A, EU-012B, and EU-012C, approved in 2014 for construction, each with a maximum rated heat input capacity of 218.6 MMBtu/hr, NO_x emissions are controlled by low NO_x burners and Flue Gas Recirculation (FGR), NO_x CEMS, exhausting to stacks S-012A, S-012B, and S-012C, respectively.

[Under 40 CFR 60, Subpart Db, these are affected emission units]

(h) Fugitive emissions from equipment leaks, identified as emission unit F-1.

[Under 40 CFR 60, Subpart VVa, this is an affected emission unit]

(i) One (1) 4,800 metric ton per day Truck and Rail Loading Operation for dry product, identified as EU-021A, approved in 2016 for construction, particulate emissions are controlled by a fabric filter dust collector, identified as BH-21A, exhausting to stack S-21A.

(j) One (1) 4,800 metric ton per day Urea Junction Operation for dry product, identified as EU-021B, approved in 2016 for construction, particulate emissions are controlled by a fabric filter dust collector, identified as BH-21B, exhausting to stack S-021B.

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

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

(k) One (1) 1.10 MMBtu/hr ammonia storage flare, using a natural gas-fired pilot, identified as emission unit EU-016, approved in 2016 for construction, used to control ammonia emissions from the storage tanks, exhausting to stack S-016.

(l) One (1) 2,640 metric ton per day Urea Synthesis Plant, identified as emission unit EU-006, approved in 2016 for construction, emissions are uncontrolled, exhausting to stack S-006.

[Under 40 CFR 60, Subpart VVa, this is an affected emission unit]

(m) One (1) 5,160 metric ton per day Urea Ammonium Nitrate (UAN) Plant, identified as emission unit EU-007, approved in 2016 for construction, emissions are uncontrolled, exhausting to stack S-007.

[Under 40 CFR 60, Subpart VVa, this is an affected emission unit]

(n) Two (2) distillate oil-fired emergency generators, identified as emission units EU-014a and EU-014b, EU-014a approved in 2014 for construction and EU-014b approved in 2016 for construction, each with a nominal rated capacity at 3,600 HP, each exhausting to stack S-014.

[Under 40 CFR 60, Subpart IIII, these are affected emission units]
[Under 40 CFR 63, Subpart ZZZZ, these are affected emission units]

(o) One (1) distillate oil-fired emergency fire water pump, identified as emission unit EU-015, approved in 2014 for construction, rated at 500 HP, exhausting to stack S-015.

[Under 40 CFR 60, Subpart IIII, this is an affected emission unit]
[Under 40 CFR 63, Subpart ZZZZ, this is an affected emission unit]

(p) One (1) eighteen cell evaporative cooling tower, identified as emission unit EU-010, approved in 2016 for construction exhausting to stacks S-010A through S-010R.

(q) One (1) nitric acid storage tank, identified as EU-054, approved in 2014 for construction, with a maximum storage capacity of 8,000 metric tons, exhausting to stack S-054. The tank does not contain an organic liquid.

(r) Three (3) Urea Ammonium Nitrate (UAN) storage tanks, identified as emission units EU-034, EU-035, and EU-036, approved in 2014 for construction, each with a maximum capacity of 40,000 metric tons, each with a volume greater than 151 cubic meters, storing a liquid with a true vapor pressure less than 3.5 kPa.

(s) One (1) diesel exhaust fluid (DEF) storage tank, identified as EU-037, approved in 2014 for construction, with a maximum capacity of 7,000 metric tons, with a volume greater than 151 cubic meters, storing a liquid with a true vapor pressure less than 3.5 kPa.

(t) One (1) OASE® solution / Methyldiethanolamine (MDEA) storage tank, identified as emission unit EU-043, approved in 2014 for construction, with a capacity of 395,000 gallons, storing a liquid with a true vapor pressure less than 3.5 kPa.

(u) Fugitive dust from paved roads and parking lots.

(v) Two (2) ammonia storage tanks, identified as EU-032 and EU-033, approved in 2014 for construction, each with a maximum capacity of 30,000 metric tons, using Ammonia Storage Flare EU-016 for emissions control, exhausting to stack S-016. The tanks do not contain an organic liquid.

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

B.2 Revocation of Permits [326 IAC 2-2-8]

Pursuant to 326 IAC 2 2 8(a)(1), this permit to construct shall expire if construction is not commenced on or before September 23, 2021 or if construction is discontinued for a period of eighteen (18) months or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)][326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

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

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

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

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

(a) This permit, T129-40329-00059, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

B.6 Enforceability [326 IAC 2-7-7][IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States

Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

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

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

B.8 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.9 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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

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

B.10 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

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

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

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

(a) A Preventive Maintenance Plan (PMP) 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 PMPs no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Southwest 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
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

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

B.14 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

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

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T129-40329-00059 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.16 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(1) That this permit contains a material mistake.

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

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4.

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

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

B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

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

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

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

B.22 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.23 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.25 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at

least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

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

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of

asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

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

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

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

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

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

(c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

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

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

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

C.12 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.13 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]

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

C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

(I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

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

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

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

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

(II)

(a) CAM *Response to excursions or exceedances.*

(1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to

normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

(1) Failed to address the cause of the control device performance problems; or

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) *CAM recordkeeping requirements.*

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

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

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

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue

MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6][326 IAC 2-2][326 IAC 2-3]

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

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

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

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

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

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

(c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][326 IAC 2-2][326 IAC 2-3][40 CFR 64][326 IAC 3-8]

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

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

(1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

(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.

(e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) *at an existing emissions unit*, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(f) The report for project at an existing emissions *unit* shall be submitted no later than sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

(g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.0 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Entire Source

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

Definitions

D.0.1 Definitions

The terms used in this Part 70 Operating Permit shall have the meanings set forth in the underlying rule or subpart and in this section, whichever is more restrictive, as follows:

(a) Natural gas-fired means an emission unit fueled by pipeline natural gas.

(b) Pipeline natural gas has the meaning outlined in 40 CFR 72.2. Pipeline natural gas means a naturally occurring fluid mixture of hydrocarbons (e.g., methane, ethane, or propane) produced in geologic formations beneath the Earth's surface that maintains a gaseous state at standard atmospheric temperature and pressure under ordinary conditions and which is provided by a supplier through a pipeline. Pipeline natural gas contains 0.5 grains or less of total sulfur per 100 standard cubic feet. Additionally, pipeline natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 950 and 1,100 Btu per standard cubic foot.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) 2,400 metric ton per day (MTPD) ammonia plant consisting of the following emission units:

(1) One (1) 950.64 MMBtu/hr reformer furnace, identified as emission unit EU-001, approved in 2014 for construction, and modified in 2019, combusting a combination of process gas and natural gas, with NO_x emissions controlled by low NO_x burners and a Selective Catalytic Reduction (SCR) Unit, identified as SCR-1, NO_x CEMS and exhausting to stack S-001.

(b) One (1) 70 MMBtu/hr natural gas-fired startup heater, identified as emission unit EU-002, approved for construction in 2016, emissions are uncontrolled, exhausting to stack S-002.

(g) Three (3) natural gas-fired auxiliary boilers, identified as emission units EU-012A, EU-012B, and EU-012C, approved in 2014 for construction, each with a maximum rated heat input capacity of 218.6 MMBtu/hr, NO_x emissions are controlled by low NO_x burners and Flue Gas Recirculation (FGR), NO_x CEMS, exhausting to stacks S-012A, S-012B, and S-012C, respectively.

[Under 40 CFR 60, Subpart Db, these are affected emission units.]

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

Construction Conditions

General Construction Conditions

D.1.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.1.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.1.3 Modifications to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operating Conditions

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

D.1.4 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limits [326 IAC 2-2-3]

Pursuant to PSD/Part 70 Operating Permit T129-33576-00059, PSD/SSM 129-36943-00059, PSD/SSM 129-40421-00059, and 326 IAC 2-2-3 (Prevention of Significant Deterioration), the best available technology (BACT) shall be as follows:

(a) **Reformer Furnace (EU-001)**
Pursuant to PSD/Operating Permit T129-33576-00059, PSD/SSM 129-40421-00059, and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for the reformer furnace (EU-001) shall be as follows:

General Conditions

(1) PM, PM_{10}, $PM_{2.5}$, NO_x, CO, VOC and GHG emissions from the operation of the reformer furnace (EU-001) shall be controlled through the use of good combustion practices and proper design;

(2) The reformer furnace (EU-001) shall combust natural gas and/or process off gas streams;

PM, PM_{10}, and $PM_{2.5}$

(3) PM, PM_{10}, and $PM_{2.5}$ emissions from the operation of the reformer furnace (EU-001) shall not exceed the limits in the following table. PM includes filterable particulate matter, while PM_{10} and $PM_{2.5}$ include both filterable and condensable particulate matter;

Pollutant	lb/MMBtu	lb/hour
PM	0.0019	1.81
PM10	0.0024	2.28
PM2.5	0.0024	2.28

NO_x

(4) NO_x emissions from the reformer furnace (EU-001) shall be controlled by low NO_x burners and selective catalytic reduction (SCR) at all times the reformer is in operation, except during startup and shutdown when the catalyst is below it normal operating temperature;

(5) NO_x emissions from the reformer furnace (EU-001) shall not exceed 9 ppm_{vd} @ 3% oxygen, based on a thirty-day rolling average, except during startup and shutdown when the catalyst temperature is below its normal operating range;

CO

(6) CO emissions from the reformer furnace (EU-001) shall not exceed 0.0194 lbs/MMBtu and 18.44 pounds per hour;

VOC

(7) VOC emissions from the reformer furnace (EU-001) shall not exceed 0.0014 lbs/MMBtu and 1.33 pounds per hour;

GHGs

(8) CO_2 emissions from the reformer furnace (EU-001) shall not exceed 59.61 tons/MMCF of fuel, excluding direct CO_2 contributions from the aMDEA section which are included in the limits for EU-003;

(9) The reformer furnace (EU-001) shall be equipped with the following energy efficiency features: air inlet controls and flue gas heat recovery to pre-heat inlet fuel, inlet air and inlet stream flows;

(10) The reformer furnace (EU-001) shall be designed to achieve a thermal efficiency of 80% (HHV); and

(11) CO_2 emissions from the reformer furnace (EU-001) shall not exceed 486,675 tons per twelve consecutive month period with compliance determined at the end of each month, excluding direct CO_2 contributions from the aMDEA section which are included in the limits for EU-003.

SSM Events for NO_x

(12) During periods of startup, shutdown, and malfunction, NO_x emissions shall be controlled by the use of good operational practices as described below:

(A) **Startup:**
Startup of the reformer furnace from cold conditions begins with the introduction of natural gas fuel to the burners and continues until the primary reformer reaches its minimum safe stable load, taking up to approximately forty-eight (48) hours. During startup, target parameters such as oxygen content, fuel/air ratios, turbulence, and temperature are variable in the convection section of the reformer furnace. The startup period ends when the reformer reaches its "minimum safe stable load" which is defined as that operating condition when:

(i) Convection zone parameters fall within ranges recommended by the manufacturer;

(ii) Catalyst tube temperatures in the radiant section have risen sufficiently to allow reforming reactions to take place; and

(iii) The burner system has reached effective operating conditions. Good combustion practices shall be used at all times during startup.

(B) **Shutdown:**
Shutdown of the reformer furnace from full load requires approximately up to twenty-four (24) hours. Shutdown BACT work practice standards shall consist of good combustion practices until the completion of shutdown. The shutdown period begins when the reformer falls below its minimum safe stable load.

(C) **Malfunction:**

During malfunctions, BACT work practice standards shall be followed for the emission unit and its air pollution control equipment as stated in Condition B.13, Emergency Conditions. Additionally, a root cause analysis of each malfunction is required to identify causes and preventive measures for each malfunction.

(b) **Startup Heater (EU-002)**
Pursuant to PSD/Operating Permit T129-33576-00059, PSD/SSM 129-36943-00059, and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for the startup heater (EU-002) shall be as follows:

General Conditions

(1) The startup heater (EU-002) shall combust natural gas;

(2) PM, PM_{10}, $PM_{2.5}$, NO_x, CO, VOC and GHG emissions from the startup heater (EU-002) shall be controlled by good combustion practices;

(3) The startup heater (EU-002) shall not operate more than 200 hours per year;

PM, PM_{10}, and $PM_{2.5}$

(4) PM, PM_{10} and $PM_{2.5}$ emissions from the startup heater (EU-002) shall not exceed 0.130, 0.522, and 0.522 lb/hour, respectively. PM includes filterable particulate matter, while, PM_{10} and $PM_{2.5}$ include both filterable and condensable particulate matter;

NO_x

(5) NO_x emissions from the startup heater (EU-002) shall not exceed 12.611 lb/hour;

CO

(6) CO emissions from the startup heater (EU-002) shall not exceed 2.556 lb/hour;

VOC

(7) VOC emissions from the startup heater (EU-002) shall not exceed 0.378 lb/hour; and

GHGs

(8) CO_2 emissions from the startup heater (EU-002) shall not exceed 8,184 lb/hour.

(9) GHG emissions from the startup heater (EU-002) shall be controlled by use of inlet air control sensors that limit excess air and good combustion practices.

(c) **Auxiliary Boilers (EU-012A, EU-012B and EU-012C)**
Pursuant to PSD/Operating Permits T129-33576-00059 and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for the natural gas-fired auxiliary boilers (EU-012A, EU-012B and EU-012C) shall be as follows:

General Conditions

(1) The natural gas-fired auxiliary boilers (EU-012A, EU-012B and EU-012C) shall combust natural gas;

(2) PM, PM_{10}, $PM_{2.5}$, NO_x, CO, VOC, and GHG emissions from the natural gas-fired auxiliary boilers (EU-012A, EU-012B and EU-012C) shall be controlled by good combustion practices at all times the boilers are in operation;

(3) Natural gas usage in each natural gas-fired auxiliary boiler (EU-012A, EU-012B and EU-012C) shall each not exceed 1,877.39 MMCF per twelve consecutive month period;

PM, PM_{10}, and $PM_{2.5}$

(3) PM emissions from the natural gas-fired auxiliary boilers (EU-012A, EU-012B and EU-012C) shall each not exceed 1.9 lb/MMCF;

(4) PM_{10} and $PM_{2.5}$ emissions from the natural gas-fired auxiliary boilers (EU-012A, EU-012B and EU-012C) shall each not exceed 7.6 lb/MMCF;

NO_x

(5) NO_x emissions from the natural gas-fired auxiliary boilers (EU-012A, EU-012B and EU-012C) shall be controlled by the use of low NO_x burners and flue gas recirculation at all times boilers are in operation;

(6) NO_x emissions from each of the natural gas-fired auxiliary boilers (EU-012A, EU-012B and EU-012C) shall not exceed 20.40 lb/MMCF, based on a three-hour average;

CO

(7) CO emissions from each of the natural gas-fired auxiliary boilers (EU-012A, EU-012B and EU-012C) shall not exceed 37.22 lb/MMCF;

VOC

(8) VOC emissions from each of the natural gas-fired auxiliary boilers (EU-012A, EU-012B and EU-012C) shall not exceed 5.5 lb/MMCF;

GHGs

(9) CO_2 emissions from each of the natural gas-fired auxiliary boilers (EU-012A, EU-012B and EU-012C) shall not exceed 59.61 ton/MMCF of natural gas combusted;

(10) Each of the natural gas-fired auxiliary boilers (EU-012A, EU-012B and EU-012C) shall be designed to achieve a minimum 80% thermal efficiency (HHV); and

(11) Each of the boilers (EU-012A, EU-012B, and EU-012C) shall be equipped with the following energy efficient design features: air inlet controls, heat recovery, condensate recovery, and blow down heat recovery.

D.1.5 General Provisions Relating to New Source Performance Standards (NSPS) [40 CFR 60, Subpart A][326 IAC 12-1]

The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the gas-fired auxiliary boilers, identified as emission units EU-012A, EU-012B, and EU-012C, except when otherwise specified in 40 CFR 60, Subpart Db.

D.1.6 New Source Performance Standards (NSPS) [40 CFR 60, Subpart Db][326 IAC 12]

The Permittee shall comply with the following provisions of 40 CFR 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) included as Attachment A of this permit, which was incorporated by reference as 362 IAC 12, for the natural gas-fired auxiliary boilers (EU-012A, EU-012B, and EU-012C) as specified as follows:

(1) 40 CFR 60.42b(k)(2);
(2) 40 CFR 60.44b(h) and (i);
(3) 40 CFR 60.44b(l);
(4) 40 CFR 60.46b(a);
(5) 40 CFR 60.46b(c);
(6) 40 CFR 60.46b(e);
(7) 40 CFR 60.48b(b) to (f);
(8) 40 CFR 60.49b(a) and (b);
(9) 40 CFR 60.49b(d);
(10) 40 CFR 60.49b(g);
(11) 40 CFR 60.49b(i); and
(12) 40 CFR 60.49b(o).

D.1.7 HAP Minor Limit [40 CFR 63][326 IAC 20]

In order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), the Permittee shall comply with the following:

Combined hexane emissions from the reformer furnace (EU-001), the natural gas startup heater (EU-002), and the auxiliary boilers (EU-012A/B/C) shall not exceed 9.90 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render this source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

D.1.8 Air Quality Impact Requirements NOx [326 IAC 2-2-5]

Pursuant to 326 IAC 2-2-5 (Air Quality Impact; Requirements), NO_x emissions from the reformer furnace (EU-001) shall not exceed 10.96 pounds per hour, based on a 3-hr average.

D.1.9 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan (PMP) is required for these units and their control devices. Section C - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.10 Testing Requirements [326 IAC 2-1.1-11]

Reformer Furnace (EU-001)

(a) In order to demonstrate the compliance status with Condition D.1.4(a)(6), not later than

one hundred and eighty (180) days after initial startup, the Permittee shall perform CO testing on the reformer furnace (EU-001) stack S-001 utilizing methods as approved by the Commissioner. This is a one-time test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(b) In order to demonstrate the compliance status with Condition D.1.4(a)(8), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform CO_2 testing on the reformer furnace (EU-001) stack S-001 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(c) In order to demonstrate the compliance status with Condition D.1.4(a)(10), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform thermal efficiency testing on the reformer furnace (EU-001) utilizing methods as approved by the Commissioner. This is a one-time test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(d) In order to verify the hexane emission rate (in lb/MMCF of natural gas), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform hexane testing on the reformer furnace (EU-001) stack S-001 utilizing methods as approved by the Commissioner. This is a one-time test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

Auxiliary Boilers (EU-012A, EU-012B and EU-012C)

(e) In order to demonstrate the compliance status with Condition D.1.4(c)(7), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform CO testing on the auxiliary boiler (EU-012A/B/C) stacks S-012A, S-012B, and S-012C utilizing methods as approved by the Commissioner. This is a one-time test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(f) In order to demonstrate the compliance status with Condition D.1.4(c)(9), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform CO_2 testing on the auxiliary boiler (EU-012A/B/C) stacks S-012A, S-012B, and S-012C utilizing methods as approved by the Commissioner. This is a one-time test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(g) In order to demonstrate the compliance status with Condition D.1.4(c)(10), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform thermal efficiency testing on auxiliary boilers EU-012A, EU-012B, and EU-012C utilizing methods as approved by the Commissioner. This is a one-time test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(h) In order to verify the hexane emission rate (in lb/MMCF of natural gas), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform hexane testing on the auxiliary boiler (EU-012A/B/C) stacks S-012A, S-012B, and S-012C utilizing methods as approved by the Commissioner. This is a one-time test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(i) Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.1.11 Greenhouse Gas Emission Calculation

Reformer Furnace (EU-001)

To determine the compliance status with Condition D.1.4(a)(11), the Permittee shall use the following equation for each fuel burned to determine the CO_2 emissions from the Reformer Furnace (EU-001):

CO_2 Emissions (ton/month) = Fuel Usage (MMCF/month) x Emission Factor (lb/MMCF) x 1 ton / 2,000 lb

The monthly fuel emission rate for each fuel shall be summed together.

Where: Fuel Usage from fuel usage data
Emission Factor - Natural Gas = 119,220 lb CO_2/MMCF
Emission Factor - Off gas = 119,220 lb CO_2/MMCF x Volume % Methane

The percent volume methane in process off-gases shall be determined through measurement, process operational data, mass balance, or other engineering methods.

D.1.12 Hexane Emission Calculation

(a) In order to determine compliance with Condition D.1.7, hexane emissions shall be calculated with the following equation:

Hexane Emissions (ton/month) = Hexane Emissions from Reformer Furnace EU-001 Natural Gas + Hexane Emissions from Reformer Furnace EU-001 Process Gas + Hexane Emissions Startup Heater EU-002 + Hexane Emissions from Auxiliary Boiler EU-012A + Hexane Emissions from Auxiliary Boiler EU-012B + Hexane Emissions from Auxiliary Boiler EU-012C

Where:

Hexane Emissions Reformer Furnace EU-001 Natural Gas (ton/month) =
Natural Gas Usage (MMCF/Current Month) x Emission Factor (1.8 lb/MMCF, or as determined by testing) x 1 ton/2,000 lb

Hexane Emissions Reformer Furnace EU-001 Process Gas (ton/month) =
Process Gas Usage (MMCF/Current Month) x Emission Factor (1.8 lb/MMCF, or as determined by testing) x 1 ton/2,000 lb

Hexane Emissions Startup Heater EU-002 =
Natural Gas Usage (MMCF/Current Month) x Emission Factor (1.8 lb/MMCF, or as determined by testing) x 1 ton/2,000 lb

Hexane Emissions from Auxiliary Boiler EU-012A =
Natural Gas Usage (MMCF/Current Month) x Emission Factor (1.8 lb/MMCF, or as determined by testing) x 1 ton/2,000 lb

Hexane Emissions from Auxiliary Boiler EU-012B =
Natural Gas Usage (MMCF/Current Month) x Emission Factor (1.8 lb/MMCF, or as determined by testing) x 1 ton/2,000 lb

Hexane Emissions from Auxiliary Boiler EU-012C =
Natural Gas Usage (MMCF/Current Month) x Emission Factor (1.8 lb/MMCF, or as determined by testing) x 1 ton/2,000 lb

(b) Natural gas and process gas usage shall be determined by flow monitoring of gases sent to the combustion unit, process operational data, mass balance or other engineering methods.

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

D.1.13 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 3-5]

(a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment for NO_x emissions on stack S-001 for the reformer furnace (EU-001).

(b) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment for NO_x emissions on stacks S-012A, S-012B, and S-012C for the auxiliary boilers (EU-012A/B/C).

(c) All CEMS required by this permit shall meet all applicable performance specifications of 40 CFR 60, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.

(d) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons for the breakdown and the efforts made to correct the problem.

(e) Whenever a NO_x CEMS is down for more than twenty-four (24) hours, the Permittee shall follow the best combustion practice.

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

D.1.14 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.4(a)(2), the Permittee shall maintain monthly records of the type of fuel consumed in the reformer furnace (EU-001).

(b) To document the compliance status with Condition D.1.4(a)(11), the Permittee shall maintain monthly records of CO_2 emissions from the reformer furnace (EU-001).

(c) To document the compliance status with Condition D.1.7, the Permittee shall maintain monthly records of hexane emissions from the reformer furnace (EU-001), the startup heater (EU-002), and auxiliary boilers (EU-012A/B/C).

(d) To document the compliance status with Condition D.1.4(b)(1), the Permittee shall maintain monthly records of the type of fuel used in the startup heater EU-002.

(e) To document the compliance status with Condition D.1.4(b)(3), the Permittee shall maintain records of the hours of operation of the startup heater EU-002.

(f) To document the compliance status with Conditions D.1.4(a)(11), D.1.4(b)(3), D.1.7, D.1.11 and D.1.12, the Permittee shall maintain all records of flow monitoring data, process operational data, mass balance, or other engineering estimation methods used to determine emissions or document compliance.

(g) To document the compliance status with Conditions D.1.4(a)(5), D.1.4(c)(6), D.1.8,

and D.1.13, the Permittee shall maintain records of the output of the continuous emission monitoring system for NO_x and shall perform the required record keeping requirements of 326 IAC 3-5-6.

(h) To document the compliance status with Condition D.1.13, the Permittee shall maintain records of all CEMS malfunctions, out of control periods, calibration and adjustment activities, and repair of maintenance activities.

(i) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

D.1.15 Reporting Requirements

(a) Quarterly reports of CO_2, startup heater (EU-002) hours and combined hexane emissions, and quarterly summaries of the information to document the compliance status with D.1.4(a)(11), D.1.4(b)(3), and D.1.7 shall be submitted 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 report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined in 326 IAC 2-7-1(35).

(b) In order to document the compliance status with Conditions D.1.4(a)(5), D.1.4(c)(6), D.1.8, and D.1.13, the Permittee shall comply with all of the reporting requirements pursuant to 326 IAC 3-5-7.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) 2,400 metric ton per day (MTPD) ammonia plant consisting of the following emission units:

(2) One (1) CO_2 purification process, identified as emission unit EU-003, approved in 2014 for construction, emissions are uncontrolled, exhausting to stack S-003.

(e) One (1) 1,320 metric ton per day Urea Granulation Unit, identified as EU-008, approved in 2016 for construction, particulate emissions are controlled by a high efficiency wet scrubber, exhausting to stack S-008.

[Under 40 CFR 60, Subpart VVa, this is an affected emission unit]

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

Construction Conditions

General Construction Conditions

D.2.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Modifications to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operating Conditions

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

D.2.4 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limits [326 IAC 2-2-3]

Pursuant to PSD/Operating Permit T129-33576-00059 and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for the CO_2 purification process (EU-003) shall be as follows:

General Conditions

(a) CO, VOC and CO_2 emissions in the CO_2 purification process (EU-003) shall be controlled by the use of good operational procedures including the selection of an optimal process catalyst;

CO

(b) CO emissions from the CO_2 purification process (EU-003) not exceed 0.0117 lb/ton ammonia produced, based on 100% CO_2 venting;

VOC

(c) VOC emissions from the CO_2 purification process (EU-003) shall not exceed 0.0558 lb/ton of ammonia produced, based on 100% CO_2 venting;

GHGs

(d) CO_2 emissions from the CO_2 purification process (EU-003) shall not exceed 1.275 tons of CO_2 per ton of ammonia produced, based on 100% CO_2 venting; and

(e) CO_2 emissions from the CO_2 purification process (EU-003) shall not exceed 1,232,475 tons per twelve consecutive month period with compliance determined at the end of each month.

D.2.5 HAPs Minor Limits [40 CFR 63][326 IAC 20]

In order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), the Permittee shall comply with the following:

Combined methanol emissions from the CO2 purification process vent (EU-003), and the Urea Granulation unit (EU-008) shall not exceed 9.98 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render this source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these emission units and any control devices. Section C - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.2.7 Testing Requirements [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Condition D.2.4(b), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform CO testing on the CO_2 purification process (EU-003) stack S-003 utilizing methods as approved by the Commissioner. This is a one-time test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(b) In order to demonstrate compliance with Condition D.2.4(c), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform VOC testing on the CO_2 purification process (EU-003) stack S-003 utilizing methods as approved by the Commissioner. This is a one-time test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(c) In order to demonstrate compliance with Condition D.2.4(d), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform CO_2 testing on

the CO_2 purification process (EU-003) stack S-003 utilizing methods as approved by the Commissioner. This is a one-time test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(d) In order to verify the methanol emission rate (in lb/ton of ammonia produced), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform methanol testing on the CO_2 purification process (EU-003) stack S-003 and the Urea Granulation Unit (EU-008) stack S-008 utilizing methods as approved by the Commissioner. This is a one-time test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(e) Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.2.8 Methanol Emission Calculation

In order to determine compliance with Condition D.2.5, methanol emissions shall be calculated with the following equation:

Methanol Emissions (ton/month) = Methanol Emissions from the CO2 Vent EU-003 + Methanol Emissions from the Granulator EU-008.

Where:

Methanol Emissions from the CO2 Vent EU-003 (ton/month) = Ammonia production, tons/month x Emission Factor (0.0186 lbs/ton ammonia, or as determined by testing) x 1 ton/2,000 lb

Methanol Emissions from the Granulator EU-008 (ton/month) = Granulator Production, tons/month x Emission Factor (0.0167 lbs/ton, or as determined by testing) x 1ton/2,000 lb

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

D.2.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.4, the Permittee shall maintain monthly records of ammonia production.

(b) To document the compliance status with Conditions D.2.4, the Permittee shall maintain all records of flow monitoring data, process operational data, mass balance, or other engineering estimation methods used to determine emissions or document compliance.

(c) To document the compliance status with Condition D.2.4(e), the Permittee shall maintain monthly records of the hours of venting of the CO_2 purification process.

(d) To document the compliance status with Condition D.2.4(e), the Permittee shall maintain monthly records of CO_2 emissions from the CO_2 purification process.

(e) To document the compliance status with Condition D.2.5, the Permittee shall maintain monthly records of Methanol emissions from the CO2 Purification process and the Urea Granulation unit.

(f) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

D.2.10 Reporting Requirements

Quarterly reports of CO_2 and methanol emissions and quarterly summaries of the information to document the compliance status with D.2.4(e) and D.2.5 shall be submitted 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 report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined in 326 IAC 2-7-1(35).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(e) One (1) 1,320 metric ton per day Urea Granulation Unit, identified as EU-008, approved in 2016 for construction, particulate emissions are controlled by a high efficiency wet scrubber, exhausting to stack S-008.

[Under 40 CFR 60, Subpart VVa, this is an affected emission unit]

(h) Fugitive emissions from equipment leaks, identified as emission unit F-1.
[40 CFR 60, Subpart VVa]

(i) One (1) 4,800 metric ton per day Truck and Rail Loading Operation for dry product, identified as EU-021A, approved in 2016 for construction, particulate emissions are controlled by a fabric filter dust collector, identified as BH-21A, exhausting to stack S-21A.

(j) One (1) 4,800 metric ton per day Urea Junction Operation for dry product, identified as EU-021B, approved in 2016 for construction, particulate emissions are controlled by a fabric filter dust collector, identified as BH-21B, exhausting to stack S-021B.

Specifically Regulated Insignificant Activities:

(l) One (1) 2,640 metric ton per day Urea Synthesis Plant, identified as emission unit EU-006, approved in 2014 for construction, emissions are uncontrolled, exhausting to stack S-006.

[Under 40 CFR 60, Subpart VVa, this is an affected emission unit]

(m) One (1) 5,160 metric ton per day Urea Ammonium Nitrate (UAN) Plant, identified as emission unit EU-007, approved in 2014 for construction, emissions are uncontrolled, exhausting to stack S-007.

[Under 40 CFR 60, Subpart VVa, this is an affected emission unit]

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

Construction Conditions

General Construction Conditions

D.3.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.3.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance

D.3.3 Modifications to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operating Conditions

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

D.3.4 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limits [326 IAC 2-2-3]

Pursuant to PSD/Part 70 Operating Permits T129-33576-00059, PSD/SSM 129-36943-00059 and 326 IAC 2-2-3 (Prevention of Significant Deterioration), the best available technology (BACT) shall be as follows:

(a) **Urea Granulation Unit (EU-008)**
Pursuant to PSD/Operating Permit T129-33576-00059, 129-36943-00059, and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for the urea granulator (EU-008) shall be as follows:

(1) The urea granulator (EU-008) shall be controlled by a wet scrubber at all times the process is in operation; and

(2) PM, PM_{10} and $PM_{2.5}$ emissions from the urea granulator (EU-008) shall each not exceed 0.163 lb per ton granules.

(3) Annual production from the granulator shall not exceed 368,040 tons per twelve (12) consecutive month period.

(b) **Fugitive Emissions from Equipment Leaks (F-1):** Fugitive VOC emissions shall be controlled by a Leak Detection and Repair (LDAR) program. The leak detection and repair program specified in 40 CFR 60, Subpart VVa shall serve as BACT for VOC fugitive emissions.

(c) **Truck and Rail Loading Operation (EU-021A)**
Pursuant to PSD/Operating Permit T129-33576-00059, 129-36943-00059 and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for the truck and rail loading operation (EU-021A) shall be as follows:

(1) The truck and rail loading operation identified as EU-021A shall be controlled by a baghouse at all times the emission unit is in operation; and

(2) PM, PM_{10}, and $PM_{2.5}$ emissions from the truck and rail loading operation identified as EU-021A shall each not exceed 0.15 lb/hr.

(d) **Urea Junction Operation (EU-021B)**
Pursuant to PSD/Operating Permit T129-33576-00059, 129-36943-00059, and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for urea junction operation (EU-021B) shall be as follows:

(1) The urea junction operation identified as EU-021B shall be controlled by a baghouse at all times the emission unit is in operation; and

(2) PM, PM_{10} and $PM_{2.5}$ emissions from the urea junction operation identified as EU-021B shall each not exceed 0.060 lb/hr.

(e) **Urea Synthesis Plant (EU-006)**
Pursuant to PSD/SSM 129-36943-00059 and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for the urea synthesis plant (EU-006) shall be as follows:

(1) The Urea Synthesis Plant (EU-006) shall use good operational practices and

(2) The CO2e emissions from the Urea Synthesis Plant (EU-006) shall not exceed 387 tons per year.

(f) **Urea Ammonium Nitrate (UAN) Plant (EU-007)**
Pursuant to PSD/SSM 129-36943-00059 and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for the urea ammonium nitrate (UAN) plant (EU-007) shall be as follows:

(1) The Urea Ammonium Nitrate Plant (EU-007) shall use good operational practices and efficient design;

(2) CO_2 emissions from the Urea Ammonium Nitrate Plant (EU-007) shall not exceed 1,713 tons of CO_2 per 12-month rolling total.

D.3.5 General Provisions Relating to New Source Performance Standards (NSPS) [40 CFR 60, Subpart A][326 IAC 12-1]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the urea granulation unit (EU-008), the urea synthesis plant (EU-006), and the urea ammonium nitrate plant (EU-007), except when otherwise specified in 40 CFR 60, Subpart VVa.

D.3.6 New Source Performance Standards (NSPS) [40 CFR 60, Subpart VVa][326 IAC 12]

The Permittee shall comply with the following provisions of 40 CFR 60, Subpart VVa Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commences after November 7, 2006, included as Attachment C of this permit, which was incorporated by reference as 362 IAC 12, for the urea granulation unit (EU-008), fugitive emissions from equipment leaks (F-1), urea synthesis plant (EU-006), and the urea ammonium nitrate plant (EU-007), as specified as follows:

(1) 40 CFR 60.480a(a) to (c);
(2) 40 CFR 60.480a(d)(1) and (d)(3);
(3) 40 CFR 60.486a(a)(1), (i), (j), and (k); and
(4) 40 CFR 60.487a.

D.3.7 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.3.8 Testing Requirements [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Condition D.3.4(a)(2), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$ testing on the urea granulation unit (EU-008) stack S-008 utilizing methods as approved by the Commissioner. This test shall be repeated at least once

every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(b) In order to demonstrate compliance with Condition D.3.4(c)(2), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$ testing on the truck and rail loading operation (EU-021A) stack S-021A utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(c) In order to demonstrate compliance with Condition D.3.4(d)(2) and within sixty (60) days of reaching maximum capacity, but no later than one hundred and eighty (180) days after initial startup, the Permittee shall perform PM, PM_{10}, and $PM_{2.5}$ testing on the urea junction operation (EU-021B) stack S-021B utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures).

(d) Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.3.9 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 emissions unit. 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)

(c) In the event that bag failure is observed in a multi-compartment baghouse, if the 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 the notification.

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

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

D.3.10 Parametric Monitoring [40 CFR Part 64]

(a) The Permittee shall record the pressure drop across the wet scrubber used in conjunction with the urea granulation unit (EU-008), at least once per day when the process is in operation. When for any one reading, the pressure drop across the

baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 4.0 and 25.0 inches of water unless a different upper-bound or lower bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take a reasonable response shall be considered a deviation from this permit.

(b) The Permittee shall record the pressure drop across the baghouse used in conjunction with the truck and rail loading operation (EU-021A), at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 1.0 and 6.0 inches of water unless a different upper-bound or lower bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take a reasonable response shall be considered a deviation from this permit.

(c) The Permittee shall record the pressure drop across the baghouse used in conjunction with the urea junction operation (EU-021B), at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 1.0 and 6.0 inches of water unless a different upper-bound or lower bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take a reasonable response shall be considered a deviation from this permit.

The instrument 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 months.

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

D.3.11 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.4(a)(3), the Permittee shall maintain monthly records of production from the granulator EU-008.

(b) To document the compliance status with Condition D.3.10(a), the Permittee shall maintain daily records of the pressure drop across the wet scrubber controlling the urea granulation unit (EU-008). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

(c) To document the compliance status with Condition D.3.10(b), the Permittee shall maintain daily records of the pressure drop across the baghouse controlling the truck and rail loading operation (EU-021A). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

(d) To document the compliance status with Condition D.3.10(c), the Permittee shall

maintain daily records of the pressure drop across the baghouse controlling the urea junction operation (EU-021B). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

(e) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

D.3.12 Reporting Requirements

A quarterly report of granulator annual production and a quarterly summary of the information to document the compliance status with D.3.4(a)(3) shall be submitted 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 report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined in 326 IAC 2-7-1(35).

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(f) One (1) 1,840 metric ton per day Nitric Acid Plant, where production is based on 100% by weight acid equivalent solution, identified as emission unit EU-009, approved in 2014 for construction, NO_x and N_2O are controlled by a catalytic reactor for N_2O control and Selective Catalytic Reduction (SCR) for NO_x control, identified as SCR-2, NO_x CEMS, exhausting to stack S-009.

[Under 40 CFR 60, Subpart Ga, this is an affected emission unit]

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

Construction Conditions

General Construction Conditions

D.4.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.4.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.4.3 Modifications to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operating Conditions

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

D.4.4 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limits [326 IAC 2-2-3]

Pursuant to PSD/Operating Permit T129-33576-00059, PSD/SSM 129-36943-00059, and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for the nitric acid plant (EU-009) shall be as follows:

(a) NO_x emissions from the nitric acid plant (EU-009) shall not exceed 0.064 lb NO_x per ton nitric acid, with the production being expressed as 100 percent nitric acid, based on a thirty-day average, except during unit startup and shutdown when the catalyst temperature is below its operational minimum temperature;

(b) NO_x emissions from the nitric acid plant (EU-009) shall be controlled by a selective catalytic reduction system (SCR) at all times the process is in operation, except during unit startup and shutdown when the catalyst temperature is below its operational minimum temperature;

(c) The CO emissions shall be controlled by the use of good process design and control;

(d) The CO emissions shall not exceed 0.178 lbs/ton of acid produced at all times except during periods of startup;

(e) CO emissions from the Nitric Acid Plant (EU-009) shall not exceed 0.083 tons per event, 4 events per year, and 3 hours/event during Startup;

(f) N_2O emissions from the nitric acid plant (EU-009) shall be controlled by a catalytic reactor at all times the process is in operation, except during unit startup and shutdown when the catalyst temperature is below its operational minimum temperature; and

(g) N_2O emissions from the nitric acid plant (EU-009) shall not exceed 0.613 lb N_2O per ton of nitric acid, with the production being expressed as 100 percent nitric acid, except during unit startup and shutdown when the catalyst temperature is below its operational minimum temperature.

(h) During periods of startup, shutdown, and malfunction, NO_x and N_2O emissions shall be controlled by the use of good operational practices as described below:

(1) **Startup:**
Startup of the nitric acid plant from cold conditions begins with the introduction of liquid ammonia feed into the unit for nitric acid production and N_2O & NO_x reduction in the control equipment. The startup procedure takes approximately up to three (3) days. During plant startup, several individual processes and equipment begin operation including cooling water flow in the ammonia evaporator, steam flow into the ammonia preheater, air compressor, a series of tailgas heaters and condensers, an ammonia burner, a tailgas turbine, an absorption tower, and the control system. Ammonia oxidation in the ammonia burner does not commence until the temperature in the burner reaches 890 °C. The startup period ends when the ammonia burner reaches the required temperature, stable production of nitric acid is occurring in the absorption tower, and the control equipment reaches an operating temperature of 600 °F. During startup, BACT work practice standards shall consist of Good Combustion Practices, where applicable, and operation of the control equipment as soon as operating temperatures are achieved. The control equipment shall begin operation and ammonia shall be injected for NO_x reduction when the control equipment reaches an operating temperature of 600°F.

(2) **Shutdown:**
Shutdown of the nitric acid plant from full load requires approximately up to two (2) days. During shutdown, BACT work practice standards shall consist of Good Combustion Practices, where applicable, and operation of the control equipment while the control equipment is above minimum operating temperature. The shutdown period begins when operating temperatures in the ammonia burner fall below 890°C and nitric acid production ceases after cutting of ammonia supplied to ammonia burner. The control equipment and ammonia injection will be discontinued when temperatures in the control equipment falls below 600°F.

(3) **Malfunctions:**
During malfunctions, BACT work practice standards shall be followed for the emission unit and its air pollution control equipment as stated in Condition B.13, Emergency Conditions.

D.4.5 General Provisions Relating to New Source Performance Standards (NSPS) [40 CFR 60, Subpart A][326 IAC 12-1]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the nitric acid plant (EU-009), except when otherwise specified in 40 CFR 60, Subpart Ga.

D.4.6 New Source Performance Standards (NSPS) [40 CFR 60, Subpart Ga][326 IAC 12]

The Permittee shall comply with the following provisions of 40 CFR 60, Subpart Ga (Standards of Performance for Nitric Acid Plants for Which Construction, Reconstruction, or Modification Commences after October 14, 2011 (Included as Attachment B of this permit) which are incorporated by reference as 326 IAC 12, for the nitric acid plant, identified as EU-009 as specified as follows:

(1) 40 CFR 60.70a;
(2) 40 CFR 60.72a;
(3) 40 CFR 60.73a;
(4) 40 CFR 60.74a;
(5) 40 CFR 60.75a;
(6) 40 CFR 60.76a; and
(7) 40 CFR 60.77a

D.4.7 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the nitric acid plant (EU-009) and its control device. Section C - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.4.8 Testing Requirements [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Condition D.4.4(c), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform N_2O testing on the nitric acid plant (EU-009) stack S-009 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. 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.

(b) In order to demonstrate compliance with Condition D.4.4(d), not later than one hundred and eighty (180) days after initial startup, the Permittee shall perform CO testing on the nitric acid plant (EU-009) stack S-009 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. 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.

D.4.9 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 3-5]

(a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment for NO_x emissions on stack S-009.

(b) All CEMS required by this permit shall meet all applicable performance specifications of 40 CFR 60, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.

(c) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons for the breakdown and the efforts made to correct the problem.

(d) Whenever a NO_x CEMS is down for more than twenty-four (24) hours, the Permittee shall follow best operational practices.

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

D.4.10 Record Keeping Requirements

(a) To document the compliance status with Condition D.4.4(a), the Permittee shall maintain monthly records of the amount of nitric acid produced in the nitric acid plant (EU-009).

(b) To document the compliance status with Condition D.4.4(a), the Permittee shall maintain records of the 30-day average NO_x emission per ton of acid produced.

(c) To document the compliance status with Conditions D.4.4 and D.4.9, the Permittee shall maintain records of flow monitoring data, process operational data, mass balance, or other engineering estimation methods used to determine emissions.

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

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(c) One (1) 1.12 MMBtu/hr Front End Flare, using a natural gas-fired pilot, identified as emission unit EU-017, approved in 2016 for construction, used to control intermittent process gas emissions from maintenance, startup, shutdown, and malfunctions, exhausting to stack S-017.

(d) One (1) 1.12 MMBtu/hr Back End Flare, using a natural gas-fired pilot, identified as emission unit EU-018, approved in 2016 for construction, exhausting to stack S-018.

Insignificant Activity:

(k) One (1) 1.10 MMBtu/hr ammonia storage flare, using a natural gas-fired pilot, identified as emission unit EU-016, approved in 2016 for construction, used to control ammonia emissions from the storage tanks, exhausting to stack S-016.

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

Construction Conditions

General Construction Conditions

D.5.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.5.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.5.3 Modifications to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operating Conditions

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

D.5.4 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limits [326 IAC 2-2-3]

Pursuant to PSD/Part 70 Operating Permit T129-33576-00059, PSD/SSM 129-36943-00059, and 326 IAC 2-2-3 (Prevention of Significant Deterioration), the best available technology (BACT) shall be as follows:

(a) **Front End Flare (EU-017)**
Pursuant to PSD/Operating Permit T129-33576-00059, PSD/SSM 129-36943-00059, and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for the front end flare (EU-017) shall be as follows:

General Conditions

(1) The pilot and purge gas fuels used in the front end flare (EU-017) shall be natural gas.

(2) Venting to the front end flare (EU-017) shall not exceed 336 hours per twelve consecutive month period with compliance determined at the end of each month.

(3) The Permittee shall comply with the following flare minimization practices to reduce emissions during startups, shut downs, and other flaring events.

(A) Flare Use Minimization: Process syngas streams to flare EU-017 shall not contain ammonia. During the startup of the sequential reformer, only one process stream at a time shall be sent to the flare to the extent practicable. Maximize the use of process syngas during the startup of the ammonia unit;

(B) The Permittee shall train all operators responsible for the day-to-day operation of the flares on the flare minimization practices and the specific procedures to follow during process startup, shut down, and other flaring events; and

(C) The Permittee shall investigate the “root cause” of malfunction events that cause flaring events other than at startup or shut down. This root cause analysis shall identify the apparent cause of unanticipated flaring event and shall recommend additional preventive measures that will minimize the chance of a repeat event. The Permittee shall implement the recommended preventive measures.

(4) Flare emissions shall be controlled by use of the following practices:

(A) Flares shall be designed for and operated with no visible emissions, except for periods not to exceed 5 minutes during any two consecutive hours;

(B) Flares shall be operated with a flame present at all times; and

(C) Flares shall be continuously monitored to assure the presence of a pilot flame with a thermocouple, infrared monitor, or other approved device.

PM, PM_{10}, and $PM_{2.5}$

(5) PM emissions from the front end flare (EU-017) shall not exceed 1.9 lb/MMCF.

(6) PM_{10} and $PM_{2.5}$ emissions from the front end flare (EU-017) shall each not exceed 7.6 lb/MMCF.

NO_x

(7) NO_x emissions from the front end flare (EU-017) shall not exceed 0.068 lb/MMBtu during normal operation.

(8) NO_x emissions from the front end flare (EU-017) shall not exceed 595.49 lb/hr during venting operations.

CO

(9) CO emissions from the front end flare (EU-017) shall not exceed 0.37 lb/MMBtu during normal operations.

(10) CO emissions from the front end flare (EU-017) shall not exceed 3,240.16 lb/hr during venting.

VOC

(11) VOC emissions from the front end flare (EU-017) shall not exceed 0.0054 lb/MMBtu during normal operations.

(12) VOC emissions from the front end flare (EU-017) shall not exceed 47.26 lb/hr during venting.

GHGs

(13) CO_2 emissions from the front end flare (EU-017) shall not exceed 116.89 lb CO_2/MMBtu during normal operation.

(14) CO_2 emissions from the front end flare (EU-017) shall not exceed 512.2 ton CO_2/hr while venting.

(b) **Back End Flare (EU-018)**
Pursuant to PSD/Operating Permit T129-33576-00059, PSD/SSM 129-36943-00059, and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for the back end flare (EU-018) shall be as follows:

General Conditions

(1) The pilot and purge gas fuels used in the back end flare (EU-018) shall be natural gas.

(2) Venting to the back end flare (EU-018) shall not exceed 336 hours per twelve consecutive month period with compliance determined at the end of each month;

(3) The Permittee shall comply with the following flare minimization practices to reduce emissions during startups, shut downs, and other flaring events:

(A) Flare Use Minimization: Flare EU-018 shall be limited to flaring ammonia during high-pressure events to the extent practicable. The ammonia compressor main shall be depressurized prior to compressor maintenance. The Permittee shall limit venting ammonia rich streams to Flare EU-018 to the extent practicable during non-emergency startup and shut down operations;

(B) The Permittee shall train all operators responsible for the day-to-day operation of the flares on the flare minimization practices and the specific procedures to follow during process startup, shut down, and other flaring events; and

(C) The Permittee shall investigate the "root cause" of malfunction events that cause flaring events other than at startup or shut down. This root cause analysis shall identify the apparent cause of unanticipated flaring event and shall recommend additional preventive measures that will minimize the chance of a repeat event. The Permittee shall implement the recommended preventive measures.

(4) Flare emissions shall be controlled by use of the following practices:

(A) Flares shall be designed for and operated with no visible emissions, except for periods not to exceed 5 minutes during any two consecutive hours;

(B) Flares shall be operated with a flame present at all times; and

(C) Flares shall be continuously monitored to assure the presence of a pilot flame with a thermocouple, infrared monitor, or other approved device.

PM, PM_{10}, and $PM_{2.5}$

(5) PM emissions from the back end flare (EU-018) shall not exceed 0.0019 lb/MMBtu.

(6) PM_{10} and $PM_{2.5}$ emissions from the back end flare (EU-018) shall each not exceed 0.0075 lb/MMBtu.

NO_x

(7) NO_x emissions from the back end flare (EU-018) shall not exceed 0.068 lb/MMBtu during normal operation.

(8) NO_x emissions from the back end flare (EU-018) shall not exceed 624.94 lb/hr during venting.

CO

(9) CO emissions from the back end flare (EU-018) shall not exceed 0.37 lb/MMBtu during normal operations.

(10) CO emissions from the back end flare (EU-018) shall not exceed 804.76 lb/hr during venting.

VOC

(11) VOC emissions from the back end flare (EU-018) shall not exceed 0.0054 lb/MMBtu during normal operations.

(12) VOC emissions from the back end flare (EU-018) shall not exceed 11.73 lb/hr during venting.

GHGs

(13) CO_2 emissions from the back end flare (EU-018) shall not exceed 116.89 lb CO_2/MMBtu during normal operation.

(14) CO_2 emissions from the back end flare (EU-018) shall not exceed 127.12 ton/hr during venting.

(c) **Ammonia Storage Flare (EU-016)**
Pursuant to PSD/Operating Permit T129-33576-00059, PSD/SSM 129-36943-00059, and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for the ammonia storage flare (EU-016) shall be as follows:

General Conditions

(1) The pilot and purge gas fuels used in the ammonia storage flare (EU-016) shall be natural gas.

(2) Venting to the ammonia storage flare (EU-016) shall not exceed 168 hours per twelve consecutive month period with compliance determined at the end of each month.

(3) The Permittee shall comply with the following flare minimization practices to reduce emissions during startups, shut downs, and other flaring events:

(A) Flare Use Minimization: The Permittee shall limit periods when the backup storage compressor and the ammonia refrigeration compressor are offline at the same time to the extent practicable;

(B) The Permittee shall train all operators responsible for the day-to-day operation of the flares on the flare minimization practices and the specific procedures to follow during process startup, shut down, and other flaring events; and

(C) The Permittee shall investigate the “root cause” of malfunction events that cause flaring events other than at startup or shut down. This root cause analysis shall identify the apparent cause of unanticipated flaring event and shall recommend additional preventive measures that will minimize the chance of a repeat event. The Permittee shall implement the recommended preventive measures.

(4) Flare emissions shall be controlled by use of the following practices:

(A) Flares shall be designed for and operated with no visible emissions, except for periods not to exceed 5 minutes during any two consecutive hours;

(B) Flares shall be operated with a flame present at all times; and

(C) Flares shall be continuously monitored to assure the presence of a pilot flame with a thermocouple, infrared monitor, or other approved device.

PM, PM_{10}, and $PM_{2.5}$

(5) PM emissions from the ammonia storage flare (EU-016) shall not exceed 0.0019 lb/MMBtu.

(6) PM_{10} and $PM_{2.5}$ emissions from the ammonia storage flare (EU-016) shall each not exceed 0.0075 lb/MMBtu.

NO_x

(7) NO_x emissions from the ammonia storage flare (EU-016) shall not exceed 0.068 lb/MMBtu during normal operation.

(8) NO_x emissions from the ammonia storage flare (EU-016) shall not exceed 125.00 lb/hr while venting.

CO

(9) CO emissions from the ammonia storage flare (EU-016) shall not exceed 0.37 lb/MMBtu during normal operations.

VOC

(10) VOC emissions from the ammonia storage flare (EU-016) shall not exceed 0.0054 lb/MMBtu during normal operations.

GHGs

(11) CO_2 emissions from the ammonia storage flare (EU-016) shall not exceed 563 tons of CO2 per twelve (12) consecutive month period.

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.5.6 Flare Emissions

Front End Flare (EU-017)

(a) In order to determine compliance with the emission limitations in Conditions D.5.4(a)(8), D.5.4(a)(10), D.5.4(a)(12) and D.5.4(a)(14), the Permittee shall use the following equations:

For NO_x, CO, VOC, and CO_2:

E = (H x EF) + PE

Where: E = Pollutant Emissions (lb/hr)
EF_{NOx} = 0.0680 lb/MMBtu
EF_{CO} = 0.3700 lb/MMBtu
EF_{VOC} = 0.0054 lb/MMBtu
EF_{CO2} = 116.8879 lb/MMBtu
PE_{NOx} = 0.076 lb/hr from pilot and purge
PE_{CO} = 0.414 lb/hr from pilot and purge
PE_{VOC} = 0.0060 lb/hr from pilot and purge
PE_{CO2} = 130.9 lb/hr from pilot and purge

$$H = \sum_{n=1}^{n=4} Fn \frac{lb}{hr} x\ HHVn\ x\ 100\%\ (portion\ of\ flare\ stream\ combusted) x\ 1\ \frac{MMBtu}{1{,}000{,}000}\ Btu$$

Where: F_{1-4} = Flow of flared gas from ammonia free streams (lb/hr)

HHV_1 = 2,830.8 Btu/lb or other value determined by testing
HHV_2 = 2,775.0 Btu/lb or other value determined by testing
HHV_3 = 6,767.2 Btu/lb or other value determined by testing
HHV_4 = 2,830.8 Btu/lb or other value determined by testing

Back End Flare (EU-018)

(b) In order to determine compliance with the emission limitations in Conditions D.5.4(b)(8), D.5.4(b)(10), D.5.4(b)(12), and D.5.4(b)(14), the Permittee shall use the following equations:

For CO, VOC, and CO_2:

$E = (H \times EF) + PE$

Where: E = Pollutant Emissions (lb/hr)
EF_{CO} = 0.3700 lb/MMBtu
EF_{VOC} = 0.0054 lb/MMBtu
EF_{CO2} = 116.8879 lb/MMBtu
PE_{CO} = 0.414 lb/hr from pilot and purge
PE_{VOC} = 0.0060 lb/hr from pilot and purge
PE_{CO2} = 130.9 lb/hr from pilot and purge

H = Hourly Heat Input (MMBtu/hr) = F_1 (lb/hr) x HHV_1 x 100% (portion of flare stream combusted) x 1 MMBtu/1,000,000 Btu

Where: F_1 = Flow of flared gas (lb/hr)
HHV_1 = 9,020.7 Btu/lb or other value determined by testing

For NO_x:

$E = (H \times EF) + PE + FE_{NOx}$

Where: E = Pollutant Emissions (lb/hr)
EF_{NOx} = 0.0680 lb/MMBtu
PE_{NOx} = 2.60 lb/hr from pilot and purge

H = Hourly Heat Input (MMBtu/hr) = F_1 (lb/hr) x HHV_1 x 100% (portion of flare stream combusted) x 1 MMBtu/1,000,000 Btu + F_2 (lb/hr) x HHV2 x 98% (portion of flare stream combusted) x 1 MMBtu/1,000,000 Btu)

Where: F_1 = Flow of flared gas (lb/hr)
HHV_1 = 9,020.7 Btu/lb or other value determined by testing
F_2 = Flow of flared gas (lb/hr)
HHV_2 = 7,996.5 Btu/lb or other value determined by testing

FE_{NOx} = F (lb/hr) x (ammonia combusted) x (ammonia in flare gas) x (M.W. of NO_2/M.W. of NH_3) x FN%

Where: F = Flow of flared gases (lb/hr)
Ammonia Combusted (98%)
Ammonia in flare gas (99.9%)
M.W. of NO_2 = molecular weight of nitrogen dioxide = 46 lb/lb-mole
M.W. of NH_3 = molecular weight of ammonia = 17 lb/lb-mole
FN = Fuel NOx factor for ammonia = 0.50%

Ammonia Storage Flare (EU-016)

(c) In order to determine compliance with the emission limits in Conditions D.5.4(c)(8) and D.5.4(c)(11), the Permittee shall use the following equations:

For CO_2:

$E = (H \times EF) + PE$

For NO_x:

$E = (H \times EF) + PE + FE_{NOx}$

Where: E = Pollutant Emissions (lb/hr)
EF_{NOx} = 0.0680 lb/MMBtu
EF_{CO2} = 0 lb/MMBtu, as there are no carbon containing vent streams
PE_{NOx} = 0.075 lb/hr from pilot and purge
PE_{CO2} = 128.6 lb/hr from pilot and purge

H = Hourly Heat Input (MMBtu/hr) = F (lb/hr) x HHV x 100% (portion of flare stream combusted) x 1 MMBtu/1,000,000 Btu

Where: F = Flow of flared gas (lb/hr)
HHV = 7,779.7 Btu/lb or other value determined by testing

FE_{NOx} = F (lb/hr) x (ammonia combusted) x (ammonia in flare gas) x (M.W. of NO_2 /M.W. of NH_3) x FN%

Where: F = Flow of flared gases (lb/hr)
Ammonia Combusted (98%)
Ammonia in Flare Gas (98.3%)
M.W. of NO_2 = molecular weight of nitrogen dioxide = 46 lb/lb-mole
M.W. of NH_3 = molecular weight of ammonia = 17 lb/lb-mole
FN = Fuel NOx factor for ammonia = 0.50%

(d) The Permittee shall determine flow rates used in equations D.5.5(a), D.5.5(b) and D.5.5(c) through flow monitoring of gases sent to the flare, process operational data, mass balance, or other engineering methods.

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

D.5.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.5.4(a)(1), the Permittee shall maintain monthly records of the type of fuel combusted in the front end flare (EU-017).

(b) To document the compliance status with Condition D.5.4(a)(2), the Permittee shall maintain a monthly records of the hours the front end flare (EU-017) vents. The Permittee shall include in its monthly record when a venting hours entry is not recorded and the reason for a lack of a venting hours entry (e.g., the process did not operate that month).

(c) To document the compliance status with Condition D.5.4(b)(1), the Permittee shall maintain monthly records of the type of fuel combusted in the back end flare (EU-018).

(d) To document the compliance status with Condition D.5.4(b)(2), the Permittee shall maintain a monthly record of the hours the back end flare (EU-018) vents. The

Permittee shall include in its monthly record when a venting hours entry is not recorded and the reason for a lack of a venting hours entry (e.g., the process did not operate that month).

(e) To document the compliance status with Condition D.5.4(c)(1), the Permittee shall maintain monthly records of the type of fuel combusted in the ammonia storage flare (EU-016).

(f) To document the compliance status with Condition D.5.4(c)(2), the Permittee shall maintain a monthly record of the hours the ammonia storage flare (EU-016) vents. The Permittee shall include in its monthly record when a venting hours entry is not recorded and the reason for a lack of a venting hours entry (e.g., the process did not operate that month).

(g) To document the compliance status with Conditions D.5.4(a)(2), D.5.4(b)(2), and D.5.4(c)(2), the Permittee shall maintain records of flow monitoring data, process operational data, mass balance, or other engineering estimation methods used to determine flare emissions.

(h) To document the compliance status with Condition D.5.6(a), the Permittee shall maintain monthly records of NO_x, CO, VOC, CO_2 emissions from the front end flare (EU-017).

(i) To document the compliance status with Condition D.5.6(b), the Permittee shall maintain monthly records of CO, VOC, CO_2 and NO_x emissions from the back end flare (EU-018).

(j) To document the compliance status with Condition D.5.6(c), the Permittee shall maintain monthly records of NO_x and CO_2 emissions from the ammonia storage flare (EU-016)

(k) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

D.5.8 Reporting Requirements

Quarterly reports of the hours of front and back end flare (EU-017 and EU-018) venting and ammonia storage flare (EU-016) venting, and quarterly summaries of the information to document the compliance status with D.5.4(a)(2), D.5.4(b)(2), and D.5.4(c)(2) shall be submitted 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 report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined in 326 IAC 2-7-1(35).

SECTION D.6 EMISSIONS UNIT OPERATION CONDITIONS

Insignificant Activity:

(p) One (1) eighteen cell evaporative cooling tower, identified as emission unit EU-010, approved in 2016 for construction exhausting to stacks S-010A through S-010R.

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

Construction Conditions

General Construction Conditions

D.6.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.6.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.6.3 Modifications to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operating Conditions

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

D.6.4 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limits [326 IAC 2-2-3]

Pursuant to PSD/Part 70 Operating Permit T129-33576-00059, PSD/SSM 129-36943-00059, and 326 IAC 2-2-3 (Prevention of Significant Deterioration), the best available technology (BACT) for the eighteen cell evaporative cooling tower (EU-010), shall be as follows:

(a) PM, PM_{10} and $PM_{2.5}$ emissions from the cooling tower (EU-010) shall be controlled by high efficiency drift eliminators;

(b) The total dissolved solids in the water used in cooling tower (EU-010) shall not exceed 2,000 mg/l, averaged on a monthly basis; and

(c) The cooling tower (EU-010) shall be designed to meet a 0.0005% drift.

D.6.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the eighteen cell cooling tower (EU-010) and their control devices. Section C - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.6.6 Parametric Monitoring

In order to demonstrate the compliance status with Condition D.6.4(a)(2), the Permittee shall record the level of total dissolved solids in the water used in the eighteen cell cooling tower (EU-010) at least once per month when the cooling tower is in operation. When for any one reading, the level of total dissolved solids is above 2,000 mg/l, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A single reading in excess of the above mentioned concentration is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.6.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.6.4(a)(2), the Permittee shall maintain a monthly record of the total dissolved solids concentration in the water used in the eighteen cell cooling tower (EU-010). The Permittee shall include in its monthly record when the total dissolved solids are not recorded and the reason for a lack of a total dissolved solids reading (e.g., the process did not operate that month).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

SECTION D.7 EMISSIONS UNIT OPERATION CONDITIONS

Insignificant Activity:

(n) Two (2) distillate oil-fired emergency generators, identified as emission units EU-014a and EU-014b, EU-014a approved in 2014 for construction and EU-014b approved in 2016 for construction, each with a nominal rated capacity at 3,600 HP, each exhausting to stack S-014.

[Under 40 CFR 60, Subpart IIII, these are affected emission units]
[Under 40 CFR 63, Subpart ZZZZ, these are affected emission units]

(o) One (1) distillate oil-fired emergency fire water pump, identified as emission unit EU-015, approved in 2014 for construction, rated at 500 HP, exhausting to stack S-015.

[Under 40 CFR 60, Subpart IIII, this is an affected emission unit]
[Under 40 CFR 63, Subpart ZZZZ, this is an affected emission unit]

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

Construction Conditions

General Construction Conditions

D.7.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.7.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.7.3 Modifications to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operating Conditions

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

D.7.4 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limits [326 IAC 2-2-3]

Pursuant to PSD/Part 70 Operating Permit T129-33576-00059, PSD/SSM 129-36943-00059, and 326 IAC 2-2-3 (Prevention of Significant Deterioration), the best available technology (BACT) shall be as follows:

(a) **Distillate Oil-Fired Emergency Generators (EU-014a and EU-014b)**
Pursuant to PSD/Operating Permit T129-33576-00059, PSD/SSM 129-36943-00059, and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for diesel-fired emergency generators (EU-014a and EU-

014b) shall be as follows:

General Conditions

(1) The hours of operation of the diesel-fired emergency generators (EU-014a and EU-014b) shall each not exceed 500 hours per twelve consecutive month period with compliance determined at the end of each month;

(2) PM, PM_{10}, $PM_{2.5}$, NO_x, CO, VOC and GHG emissions from the diesel-fired emergency generators (EU-014a and EU-014b) shall be controlled by the use of good combustion practices;

PM, PM_{10}, and $PM_{2.5}$

(3) The PM, PM_{10} and $PM_{2.5}$ emissions from the operation of the diesel-fired emergency generators (EU-014a and EU-014b) shall each not exceed 0.15 g/hp-hr;

NO_x

(4) NO_x emissions from the diesel-fired emergency generators (EU-014a and EU-104b) shall not exceed 4.42 g/hp-hr per engine;

CO

(5) CO emissions from the diesel-fired emergency generators (EU-014a and EU-014b) shall not exceed 2.61 g/hp-hr per engine;

VOC

(6) VOC emissions from the diesel-fired emergency generators (EU-014a and EU-014b) shall not exceed 0.35 g/hp-hr per engine; and

GHGs

(7) CO_2 emissions from the diesel-fired emergency generators (EU-014a and EU-014b) shall each not exceed 1,044 tons per twelve (12) consecutive month period.

(b) **Distillate Oil-Fired Emergency Fire Water Pump (EU-015)**
Pursuant to PSD/Operating Permit T129-33576-00059 and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the best available control technology (BACT) for diesel-fired emergency fire water pump (EU-015) shall be as follows:

General Conditions

(1) PM, PM_{10}, $PM_{2.5}$, NO_x, CO, VOC and GHG emissions from the diesel-fired emergency fire water pump (EU-015) shall be controlled by good combustion practices;

(2) The hours of operation of the diesel-fired emergency fire water pump (EU-015) shall not exceed 500 hours per twelve consecutive month period with compliance determined at the end of each month;

PM, PM_{10}, and $PM_{2.5}$

(3) PM, PM_{10}, and $PM_{2.5}$ emissions from the diesel-fired emergency fire water pump (EU-015) shall each not exceed 0.15 g/hp-hr;

NO_x

(4) NO_x emissions from the diesel-fired emergency fire water pump (EU-015) shall not exceed 2.83 g/hp-hr;

CO

(5) CO emissions from the diesel-fired emergency firewater pump (EU-015) shall not exceed 2.60 g/hp-hr;

VOC

(6) VOC emissions from the diesel-fired emergency fire water pump (EU-015) shall not exceed 0.141 g/hp-hr; and

GHGs

(7) CO_2 emissions from the diesel-fired emergency fire water pump (EU-015) shall not exceed 527.40 g/hp-hr.

D.7.5 General Provisions Relating to New Source Performance Standards (NSPS) [40 CFR 60, Subpart A][326 IAC 12-1]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the distillate oil-fired emergency generators (EU-014a and EU-014b), and the distillate oil-fired emergency fire water pump (EU-015), except when otherwise specified in 40 CFR 60, Subpart IIII.

D.7.6 New Source Performance Standards (NSPS) [40 CFR 60, Subpart IIII][326 IAC 12]

The Permittee shall comply with the following provisions of 40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (included as Attachment D of this permit) which are incorporated by reference as 326 IAC 12, for the distillate oil-fired emergency generators (EU-014a and EU-014b), and the distillate oil-fired emergency fire water pump (EU-015), as specified as follows:

(a) The emergency generators (EU-014a and EU-014b) (3,600 HP, each) are subject to the following portions of Subpart IIII:

(1) 40 CFR 60.4200(a)(2)(i);
(2) 40 CFR 60.4205(b);
(3) 40 CFR 60.4206;
(4) 40 CFR 60.4207(b);
(5) 40 CFR 60.4208;
(6) 40 CFR 60.4209(a);
(7) 40 CFR 60.4211(a), (c), and (f);
(8) 40 CFR 60.4214(b); and
(9) 40 CFR 60.4218.

(b) The emergency fire water pump (500 HP) is subject to the following portions of Subpart IIII:

(1) 40 CFR 60.4200(a)(2)(ii);
(2) 40 CFR 60.4205(c);

(3) 40 CFR 60.4206;
(4) 40 CFR 60.4207(b);
(5) 40 CFR 60.4208;
(6) 40 CFR 60.4209(a);
(7) 40 CFR 60.4211(a), (c), and (f);
(8) 40 CFR 60.4214(b); and
(9) 40 CFR 60.4218.

D.7.7 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants (NESHAP) [40 CFR 63, Subpart A][326 IAC 20-1]

Pursuant to 40 CFR 63.6665, the Permittee shall comply with the provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, as specified in Table 8 of 40 CFR 63, Subpart ZZZZ, in accordance with the schedule in 40 CFR 63, Subpart ZZZZ.

D.7.8 National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ][326 IAC 20-82]

The Permittee shall comply with the following provisions of 40 CFR 63, Subpart ZZZZ, which are incorporated by reference as 326 IAC 20-82 (Included as Attachment F of this permit), for the distillate oil-fired emergency generators (EU-014a and EU-014b), and the distillate oil-fired emergency fire water pump (EU-015), upon startup of the affected source:

(1) 40 CFR 63.6585(c);
(2) 40 CFR 63.6590(a)(2)(iii);
(3) 40 CFR 63.6590(c)(1);
(4) 40 CFR 63.6595(a)(7);
(5) 40 CFR 63.6670; and
(6) 40 CFR 63.6675.

D.7.9 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the distillate oil-fired emergency generators (EU-014a and EU-014b), and the distillate oil-fired emergency fire water pump (EU-015). Section C - 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 2-7-5(3)][326 IAC 2-7-19]

D.7.10 Record Keeping Requirements

(a) To document the compliance status with Condition D.7.4(a)(1), the Permittee shall maintain a monthly record of the hours of operation of the diesel-fired emergency generators (EU-014a and EU-014b).

(b) To document the compliance status with Condition D.7.4(b)(2), the Permittee shall maintain a monthly record of the hours of operation of the diesel-fired emergency fire water pump (EU-015).

(c) Reserved

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

D.7.11 Reporting Requirements

Quarterly reports of the hours of operation of the diesel-fired emergency generators (EU-014a and EU-014b) and the diesel-fired emergency fire water pump (EU-015), and quarterly summaries of the information to document the compliance status with D.7.4(a)(1) and

D.7.4(b)(2) shall be submitted 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 report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined in 326 IAC 2-7-1(35).

SECTION D.8 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activity:

(u) Fugitive dust from paved roads and parking lots.

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

Construction Conditions

General Construction Conditions

D.8.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.8.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.8.3 Modifications to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operating Conditions

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

D.8.4 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limits [326 IAC 2-2-3]

Pursuant to PSD/Part 70 Operating Permit T129-33576-00059, PSD/SSM 129-36943-00059, and 326 IAC 2-2-3 (Prevention of Significant Deterioration), the best available technology (BACT) for fugitive dust from paved roads and parking areas shall be as follows:

PM, PM_{10}, and $PM_{2.5}$ emissions from paved haul roads shall be controlled to an overall control efficiency of 90% by employing the following work practices:

(a) Paving all plant haul roads;

(b) Daily sweeping with wet suppression; and

(c) Prompt cleanup of any spilled materials.

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

D.8.5 Compliance Determination Requirements

To demonstrate compliance with Condition D.8.4, the Permittee shall comply with the following:

(a) Wet Suppression for roadway dust control shall be performed on paved roads except when:

(1) It is raining or snowing at the time of the scheduled treatment,
(2) The subject portion of the haul roads is covered by ice or snow or remains wet from recent precipitation or the previous wet suppression, or
(3) The road is not being used as a haul road on that day.

If ambient air temperature is below 32 °F at the time of a scheduled wet suppression treatment, the Permittee may clean the roadway with a vacuum sweeper in lieu of the wet suppression treatment.

(b) Compliance shall be demonstrated for each active haul road using records of haul road usage and control measures. The frequency of required roadway dust control treatments for haul roads shall be at least daily, unless a treatment is not required for a reason under (a) above, and the frequency shall be sufficient to achieve 90% control based on the following formula or an equivalent:

Control Efficiency = 96 - (0.263 x (T / C))

Where: Control Efficiency = percent control efficiency
T = Daily truck trips on roadway (truck trips/calendar day)
C = Number of roadway dust control treatments per calendar day.

For the purposes of this formula, if at the time of a scheduled roadway dust control treatment, the treatment is not required for one of the reasons under (a) above, such an event shall be counted as a roadway dust control treatment.

(c) Haul truck speed limits shall be posted as 15 miles per hour or less.

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

D.8.6 Ambient Temperature Monitoring

To demonstrate the compliance status with Condition D.8.5, the Permittee shall maintain an ambient temperature monitor when ambient temperatures may drop below 32 °F.

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

D.8.7 Record Keeping Requirements

To document the compliance status with Conditions D.8.4 and D.8.5, the Permittee shall maintain the following daily records for haul roads:

(a) The number of trucks on the haul road each calendar day.

(b) The date, approximate time, and type of each roadway dust control treatment.

(c) If a treatment of the haul roads is not required and not performed in accordance with Condition D.8.5, records shall be maintained documenting the reason for the lack of a treatment (i.e. ambient temperature, precipitation, etc.).

SECTION D.9 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Entire Source

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

National Emission Standards for Hazardous Air Pollutants

D.9.1 General Provisions Relating to the National Emission Standards for Hazardous Air Pollutants (NESHAP) [40 CFR 61, Subpart FF][326 IAC 14-1]

The Permittee shall comply with the provisions of 40 CFR 61, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 14-1.

D.9.2 National Emission Standards for Hazardous Air Pollutants for Benzene Waste Operations [40 CFR 61, Subpart FF][326 IAC 14]

The Permittee shall comply with the following provisions of 40 CFR 61, Subpart FF, which are included as Attachment E of this permit for all affected facilities upon startup of the affected source. The entire source is subject to the following portions of 40 CFR 61, Subpart FF:

(1) 40 CFR 61.340(a) and (c);
(2) 40 CFR 61.341;
(3) 40 CFR 61.342(a);
(4) 40 CFR 61.355;
(5) 40 CFR 61.356; and
(6) 40 CFR 61.357(a) and (b).

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

Source Name: Midwest Fertilizer Company LLC
Source Address: Intersection Old SR 69 and Mackey Ferry Road, Mt. Vernon, Indiana 47620

Part 70 Permit No.: T129-33576-00059

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Midwest Fertilizer Company LLC
Source Address: Intersection Old SR 69 and Mackey Ferry Road, Mt. Vernon, Indiana 47620

Part 70 Permit No.: T129-33576-00059

This form consists of 2 pages **Page 1 of 2**

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

Part 70 Quarterly Report - Reformer Furnace CO_2 (EU-001)

Source Name: Midwest Fertilizer Company LLC
Source Address: Intersection Old SR 69 and Mackey Ferry Road East, Mt. Vernon, Indiana 47620
Part 70 Permit No.: T129-33576-00059
Facility: Reformer Furnace (EU-001)
Parameter: CO_2 Emissions (Condition D.1.4(a)(11))
Limit: 486,675 tons / twelve consecutive month period with compliance determined by the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report - Source Wide Hexane Limit

Source Name: Midwest Fertilizer Company LLC
Source Address: Intersection Old SR 69 and Mackey Ferry Road East, Mt. Vernon, Indiana 47620
Part 70 Permit No.: T129-33576-00059
Facility: Reformer furnace (EU-001), startup heater (EU-002), and auxiliary boilers (EU-012A/B/C)
Parameter: Hexane Emissions (Condition D.1.7)
Limit: 9.90 tons / twelve consecutive month period with compliance determined by the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report - CO_2 Purification Process (EU-003) CO_2 Emissions

Source Name: Midwest Fertilizer Company LLC
Source Address: Intersection Old SR 69 and Mackey Ferry Road East, Mt. Vernon, Indiana 47620
Part 70 Permit No.: T129-33576-00059
Facility: CO_2 Purification Process (EU-003)
Parameter: CO_2 Emissions (Condition D.2.4(e))
Limit: 1,232,475 tons / twelve consecutive month period with compliance determined by the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report - Front End Flare (EU-017)

Source Name: Midwest Fertilizer Company LLC
Source Address: Intersection Old SR 69 and Mackey Ferry Road East, Mt. Vernon, Indiana 47620
Part 70 Permit No.: T129-33576-00059
Facility: Front End Flare (EU-017)
Parameter: Venting Hours (Condition D.5.4(a)(2))
Limit: 336 hours / twelve consecutive month period with compliance determined by the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (hours)	Previous 11 Months (hours)	12 Month Total (hours)

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report - Back End Flare Venting (EU-018)

Source Name: Midwest Fertilizer Company LLC
Source Address: Intersection Old SR 69 and Mackey Ferry Road East, Mt. Vernon, Indiana 47620
Part 70 Permit No.: T129-33576-00059
Facility: Back End Flare (EU-018)
Parameter: Venting Hours (Condition D.5.4(b)(2))
Limit: 336 hours / twelve consecutive month period with compliance determined by the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (hours)	Previous 11 Months (hours)	12 Month Total (hours)

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report - Ammonia Storage Flare Venting (EU-016)

Source Name: Midwest Fertilizer Company LLC
Source Address: Intersection Old SR 69 and Mackey Ferry Road East, Mt. Vernon, Indiana 47620
Part 70 Permit No.: T129-33576-00059
Facility: Ammonia Storage Flare (EU-016)
Parameter: Venting Hours (Condition D.5.4(c)(2))
Limit: 168 hours / twelve consecutive month period with compliance determined by the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (hours)	Previous 11 Months (hours)	12 Month Total (hours)

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report - Emergency Generator (EU-014)

Source Name: Midwest Fertilizer Company LLC
Source Address: Intersection Old SR 69 and Mackey Ferry Road East, Mt. Vernon, Indiana 47620
Part 70 Permit No.: T129-33576-00059
Facility: Emergency Generator EU-014a
Parameter: Hours of Operation (Condition D.7.4(a)(1))
Limit: 500 hours / twelve consecutive month period with compliance determined by the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (hours)	Previous 11 Months (hours)	12 Month Total (hours)

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report - Emergency Generator (EU-014)

Source Name: Midwest Fertilizer Company LLC
Source Address: Intersection Old SR 69 and Mackey Ferry Road East, Mt. Vernon, Indiana 47620
Part 70 Permit No.: T129-33576-00059
Facility: Emergency Generator EU-014b
Parameter: Hours of Operation (Condition D.7.4(a)(1))
Limit: 500 hours / twelve consecutive month period with compliance determined by the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (hours)	Previous 11 Months (hours)	12 Month Total (hours)

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report - Fire Water Pump (EU-015)

Source Name: Midwest Fertilizer Company LLC
Source Address: Intersection Old SR 69 and Mackey Ferry Road East, Mt. Vernon, Indiana 47620
Part 70 Permit No.: T129-33576-00059
Facility: Fire Water Pump (EU-015)
Parameter: Operating Hours (Condition D.7.4(b)(2))
Limit: 500 hours / twelve consecutive month period with compliance determined by the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (hours)	Previous 11 Months (hours)	12 Month Total (hours)

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report - Source Wide Methanol Limit

Source Name: Midwest Fertilizer Company LLC
Source Address: Intersection Old SR 69 and Mackey Ferry Road East, Mt. Vernon, Indiana 47620
Part 70 Permit No.: T129-33576-00059
Facility: CO2 Purification Process (EU-003) and Urea Granulation Unit (EU-008)
Parameter: Methanol Emissions (Condition D.2.5)
Limit: 9.98 tons / twelve consecutive month period with compliance determined by the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Source Name: Midwest Fertilizer Company LLC
Source Address: Intersection Old SR 69 and Mackey Ferry Road, Mt. Vernon, Indiana 47620

Part 70 Permit No.: T129-33576-00059

Months: _____ to _____ Year: _____

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

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Midwest Fertilizer Company LLC
Intersection Old SR 69 and Mackey Ferry Road
Mt. Vernon, Indiana 47620

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

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

2. I hold the position of _____ for _____.
(Title) (Company Name)

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

4. I hereby certify that Midwest Fertilizer Company LLC Intersection Old SR 69 and Mackey Ferry Road, Mt. Vernon, Indiana 47620, completed construction of the nitrogen fertilizer manufacturing facility on in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on August 26, 2013, and as permitted pursuant to New Source Construction Permit and Part 70 Operating Permit No. T129-40329-00059, Plant ID No. 129-00059 issued on _____.

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

Further Affiant said not.

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

Signature

_____

Date

_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

_____.

Signature_____
Name_____ (typed or printed)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Mr. J. Leslie Wright
Midwest Fertilizer Company
101 West Ohio Street, Suite 1010
Indianapolis, IN 46204

DATE: March 17, 2020

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

SUBJECT: Final Decision
Title V – Administrative Amendment
129-42647-00059

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because 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.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Tom Rarick, Environmental Resources Management (ERC)

In addition, the Notice of Decision has been sent to the OAQ Permits Branch Interested Parties List.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Mail Code 61-53

IDEM Staff	VBIDDLE 3/17/2020 Midwest Fertilizer Company LLC	129-42647-00059 129-42626-00059	FINAL FINAL	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee / Remarks
1		Les Wright Midwest Fertilizer Company LLC 101 W Ohio St #1450 Indianapolis IN 46204 (Source CAATS) SHIP VIA UPS									
2		Thomas Sommerfield 2700 Blackburn Rd Mt Vernon In 47620 *(Affected Party)*									
3		Steve Wilson 951 N Park Dr Evansville IN 47710 *(Affected Party)*									
4		Gil Barchet 9020 Fischer Rd Evansville IN 47720 *(Affected Party)*									
5		John Blanton 530 Mill St Mt Vernon IN 47620 *(Affected Party)*									
6		George Postletheweight 5901 Hartman Rd Mt Vernon IN 47620 *(Affected Party)*									
7		Steve Beegle 6355 Woodland Springs Dr Newburgh IN 47630 *(Affected Party)*									
8		Don Mattingly 10535 Downen Rd Wadesville In 47638 *(Affected Party)*									
9		Judy Heberer 7536 Sauerkraut Mt Vernon IN 47620 *(Affected Party)*									
10		Greg Bussell 2212 Tanglewood Dr Mt Vernon IN 47620 *(Affected Party)*									
11		Rodney Cox 1907 Holler Rd Mt Vernon IN 47620 *(Affected Party)*									
12		Lee Reeves 1800 Green Briar Mt Vernon IN 47620 *(Affected Party)*									
13		Anthony Gross 7575 S Sauerkraut Ln Mt Vernon IN 47620 (Affected Party)									
14		Christine Dunn Henderson 10131 Bahamas Circle Fishers IN 46037 *(Affected Party)*									
15		Mark Bryant Valley Watch Inc. 800 Adams Avenue Evansville IN 47713 *(Affected Party)*									

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

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1		Michael J Zupan 2811 Graddy Road Mount Vernon IN 47620 (Affected Party)									
2		Posey County Commissioners County Courthouse, 126 E. 3rd Street Mount Vernon IN 47620 *(Local Official)*									
3		Posey County Health Department 100 Vista Dr Mount Vernon IN 47620 *(Health Department)*									
4		Mount Vernon City Council and Mayors Office 520 Main Street Mount Vernon IN 47620 *(Local Official)*									
5		Dr. Jeff Seyler Univ. of So Ind., 8600 Univ. Blvd. Evansville IN 47712 *(Affected Party)*									
6		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 *(Affected Party)*									
7		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 *(Affected Party)*									
8		Christian Borowiecki Vanderburgh County Health Dept. 420 Mulberry ST. Evansville IN 47713 *(Affected Party)*									
9		Mrs. Connie Parkinson 510 Western Hills Dr. Mt. Vernon IN 47620 *(Affected Party)*									
10		Robert Hess c/o Mellon Corporation 830 Post Road East, Suite 105 Westport CT 06880 *(Affected Party)*									
11		State of Indiana 3650 S US Hwy 41 Vincennes IN 47759 *(Affected Party)*									
12		Tom Garrett 5313 Old Booneville Hwy Evansville IN 47715 *(Affected Party)*									
13		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)									
14		John Blair 800 Adams Ave Evansville IN 47713 *(Affected Party)*									
15		Agrigenetics, Inc. 2030 Dow Center/317 Midland MI 48674 *(Affected Party)*									

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1		Allyn Land Company, LP 5101 Lamont Road Mt Vernon IN 47620 (Affected Party)									
2		Howmull Properties, LLC 15 E Main Street Ste 300 Carmel IN 46032 *(Affected Party)*									
3		Ports of Indiana 150 W Market Suite 100 Indianapolis IN 46204 *(Affected Party)*									
4		Mt. Vernon Coal Transfer 2720 N Hemlock Ct, Ste B Broken Arrow OK 74012 *(Affected Party)*									
5		Esther Uebelhack 2800 Lower Mt Vernon Road Mt. Vernon IN 47620 *(Affected Party)*									
6		James F Davis 608 East Grant Street Mt Vernon IN 47620 *(Affected Party)*									
7		Thomas Guggenheim 7160 Upton Rd Mt Vernon IN 47620 *(Affected Party)*									
8		Ed Adams 210 Dogwood Pl Mt Vernon IN 47620 *(Affected Party)*									
9		Tom Rarick 8425 Woodfield Crossing Blvd., Suite 560-W Indianapolis, IN 46240									
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