Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a Part 70 Operating Permit Renewal

Source Description and Location

Source Name:	**MGPI of Indiana, LLC**
Source Location:	**7 Ridge Avenue, Lawrenceburg, Indiana 47025**
County:	**Dearborn**
SIC Code:	**2085**
Permit Renewal No.:	**T029-32119-00005**
Permit Reviewer:	**Kristen Willoughby**

On April 22, 2014, the Office of Air Quality (OAQ) had a notice published in the Journal Press, Lawrenceburg, Indiana, stating that MGPI of Indiana, LLC had applied for a Part 70 Operating Permit Renewal to continue operating stationary distilled spirits production source. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On May 20, 2014, Mr. Randy Graves, on behalf of MGPI of Indiana, LLC, submitted comments on the proposed Part 70 permit.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Section E.3.2, National Emission Standards for Hazardous Air Pollutants (NESHAP for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters [326 IAC 20-95] [40 CFR 63 Subpart DDDDD]:

Please remove the following non-applicable provisions of 40 CFR 63 Subpart DDDDD which are currently listed in the permit for the natural gas fired boilers, EU-96 and EU-97:

- (5) 63.7499(m): (m) pertains to units designed to burn gas 2 (other) subcategory, which does not apply to EU-96 and EU-97.
- (7)63.7505(h) & (8) 63.7540(c)(13): these citations are not found in the current version of 40 CFR 63 Subpart DDDDD.
- Table 2 – Table 2 limits for existing sources do not apply to the units designed to burn gas 1 subcategory.

Please add the following provisions of 40 CFR 63 Subpart DDDDD, not currently listed in the permit, which apply to the natural gas fired boilers, EU-96 and EU-97:

- 63.7500(a)(3), (e), (f)
- 63.7510(e)
- 63.7515(d)
- 63.7521(f), (g), (h), (i)

- 63.7530(d), (e), (f), (g)
- 63.7540(a)(13), (b), (c)

Response to Comment 1:

This change has been made.

Changes to the Permit:

E.3.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters [326 IAC 20-95] [40 CFR 63 Subpart DDDDD]

Pursuant to 40 CFR 63 Subpart DDDDD, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart DDDDD, which are incorporated by reference at 326 IAC 20-95 (included as Attachment ~~D~~**C** of this permit) for the natural gas fired boilers identified as EU-96 and EU-97 as specified as follows:

(1) 63.7480
(2) 63.7485
(3) 63.7490 (a)(1), (d)
(4) 63.7495 (b). (d)
(5) 63.7499 (l). ~~(m)~~
(6) 63.7500 (a)(1)**, (a)(3), (e), (f)**
(7) 63.7505 (a), ~~(h)~~
(8) 63.7510 (e)
(9) 63.7515 (d)
(10) 63.7521 (f), (g), (h), (i)
(11) 63.7530 (d), (e), (f), (g)
(~~8~~**12**) 63.7540 (a)(10), ~~(c)(13)~~ **(a)(13), (b), (c)**
(~~9~~**13**) 63.7545
(~~10~~**14**) 63.7550
(~~11~~**15**) 63.7555
(~~12~~**16**) 63.7560
(~~13~~**17**) 63.7565
(~~14~~**18**) 63.7570
(~~15~~**19**) 63.7575
~~(16) Table 2~~
(~~17~~**20**) Table 3
(~~18~~**21**) Table 9
(~~19~~**22**) Table 10

Changes to the Technical Support Document:

(t) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD for the steam boiler, identified as EU-96 utilizing natural gas and for steam boiler, identified as EU-97 and utilizing natural gas and No. 2 fuel oil for back-up. **The No. 2 fuel oil is only used during periods of gas curtailment or gas supply interruptions. Therefore, EU-97 meets the definition of a "unit designed to burn gas 1 subcategory" under 40 CFR 63.7575.**

Nonapplicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart DDDDD.

(1) 63.7480
(2) 63.7485
(3) 63.7490 (a)(1), (d)
(4) 63.7495 (b). (d)
(5) 63.7499 (l). ~~(m)~~
(6) 63.7500 (a)(1)**, (a)(3), (e), (f)**
(7) 63.7505 (a), ~~(h)~~
(8) 63.7510 (e)
(9) 63.7515 (d)
(10) 63.7521 (f), (g), (h), (i)
(11) 63.7530 (d), (e), (f), (g)
(~~8~~**12**) 63.7540 (a)(10), ~~(c)(13)~~ **(a)(13), (b), (c)**
(~~9~~**13**) 63.7545
(~~10~~**14**) 63.7550
(~~11~~**15**) 63.7555
(~~12~~**16**) 63.7560
(~~13~~**17**) 63.7565
(~~14~~**18**) 63.7570
(~~15~~**19**) 63.7575
~~(16) Table 2~~
(~~17~~**20**) Table 3
(~~18~~**21**) Table 9
(~~19~~**22**) Table 10

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart DDDDD.

Comment 2:

Please remove the current Attachment B of the permit, 40 CFR 60 Subpart VV, Standards of Performance for Equipment Leaks of VOC in Synthetic Organic Chemicals Manufacturing Industry for which Construction Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006. This regulation does not apply to the facility and the draft permit table of contents does not list this attachment.

Response to Comment 2:

This change has been made.

Comment 3:

Please revise current Attachment C (40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines), to instead be Attachment B, to match the listing in the draft permit table of contents.

Response to Comment 3:

This change has been made.

Changes to the Permit:

E.2.2 National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]

Pursuant to 40 CFR Part 63, Subpart ZZZZ, the Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment ~~C~~**B** to this permit) which are incorporated by reference as 326 IAC 20-82, for the reciprocating internal combustion engines, as specified as follows:

Changes to the Attachment:

Attachment ~~C~~**B**
Part 70 Operating Permit Renewal T029-32119-00005

Comment 4:

Please revise current Attachment D (40 CFR 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters), to instead be Attachment C, to match the listing in the draft permit table of contents.

Response to Comment 4:

This change has been made.

Changes to the Permit:

E.3.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters [326 IAC 20-95] [40 CFR 63 Subpart DDDDD]

Pursuant to 40 CFR 63 Subpart DDDDD, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart DDDDD, which are incorporated by reference at 326 IAC 20-95 (included as Attachment ~~D~~**C** of this permit) for the natural gas fired boilers identified as EU-96 and EU-97 as specified as follows:

Changes to the Attachment:

Attachment ~~D~~**C**
Part 70 Operating Permit Renewal T029-32119-00005

Comment 5:

Emission Calculations, Summary of Emissions:
Please correct the dates in the column headers for Potential to Emit Before Controls, Potential to Emit After Controls, and Potential to Emit After Issuance of Permit (Limited PTE) for GHGs, see below:

GHG (tons/yr)	GHG (tons/yr)
~~11/29/2009~~ **10/30/2009**	~~10/30/2013~~ **11/29/2013**

The corrected dates above reflect the Federal Register publication dates for the two sets of global warming potentials used to calculate CO_2e emissions in Appendix A of the TSD.

Response to Comment 5:

This change has been made.

Changes to TSD Appendix A:

GHG (tons/yr)	GHG (tons/yr)
~~11/29/2009~~ **10/30/2009**	~~10/30/2013~~ **11/29/2013**

Comment 6:

Emission Calculations, Summary of Emissions:
Please correct the Potential to Emit After Control (ton/yr) for VOC (tons/yr) and Total HAPs (tons/yr) for Fugitive Emissions. Please see below:

VOC (tons/yr)	Total HAPs (tons/yr)
128.2 ~~0.0~~	0.90 ~~0.00~~

Response to Comment 6:

This change has been made.

Changes to TSD Appendix A:

VOC (tons/yr)	Total HAPs (tons/yr)
128.2 ~~0.0~~	0.90 ~~0.00~~

Comment 7:

Emission Calculations, Summary of Emissions:
Please correct the Potential to Emit After Issuance of Permit for EU-97 GHG Emissions. Please see below:

GHG (tons/yr)	GHG (tons/yr)
~~11/29/2009~~ **10/30/2009**	~~10/30/2013~~ **11/29/2013**
~~31,926~~ **31,930**	~~31,930~~ **31,926**

Response to Comment 7:

This change has been made.

Changes to TSD Appendix A:

GHG (tons/yr)	GHG (tons/yr)
~~11/29/2009~~ **10/30/2009**	~~10/30/2013~~ **11/29/2013**
~~31,926~~ **31,930**	~~31,930~~ **31,926**

IDEM Contact

(a) Questions regarding this proposed Part 70 Operating Permit Renewal can be directed to Kristen Willoughby at the 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) 233-3031 or toll free at 1-800-451-6027 extension 3-3031.

(b) A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov