



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 18 2015

REPLY TO THE ATTENTION OF:

Matt Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft title V operating permit renewal, permit number 097-34650-00042, for Ingredion Incorporated Indianapolis Plant. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

- 1.) Condition D.1.9 includes parametric monitoring of the first effect water wash system based on the compliance assurance monitoring (CAM) requirements of 40 CFR Part 64. Page 29 of the technical support document (TSD) states that the first effect water wash system associated with feed dryer 5502-1A is not subject to CAM for its sulfur dioxide (SO₂) emissions. Please verify whether unit 5502-1A is subject to CAM for SO₂ and either correct Condition D.1.9's citation to origin and authority or correct the CAM applicability analysis in the addendum to the TSD.
- 2.) Conditions D.1.6, D.2.5, and D.3.5 do not specify the underlying applicable requirement for each permit condition. Please ensure that each permit condition references its origin and authority as required by 326 IAC 2-7-5(1)(A) and 40 CFR § 70.6(a)(1)(i).

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,


Genevieve Damico
Chief
Air Permits Section