



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

DEC 03 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 prevention of significant deterioration (PSD) and part 70 operating permit renewal, permit numbers 027-35177-00046 and 027-31396-00046, respectively, for Grain Processing Corporation. 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.7.10 requires daily pH monitoring of APC31 and APC34 scrubbing liquid. Condition D.7.15(b), the associated recordkeeping requirement for the scrubbers, only requires daily pH records to be maintained for APC31 and not APC34. We request that you incorporate recordkeeping requirements for APC34's scrubbing liquid pH.
- 2.) Condition D.8.9 describes parametric monitoring for scrubber SPC49. According to page 34 of the technical support document (TSD), the starch dryer, which uses scrubber SPC49 as a control device, is subject to 40 CFR Part 64, compliance assurance monitoring (CAM). Please clarify whether monitoring required in condition D.8.9 is meant to satisfy CAM requirements given at 40 CFR Part 64.
- 3.) Condition D.9.1 requires 0% opacity as part of Best Available Control Technology (BACT) for the maltodextrin drying system as measured from stack MP40. TSD, appendix B, page 45 explains that the allowable opacity from stack MP39, which the maltodextrin drying system may exhaust to, was determined to be 0%. Please clarify whether the maltodextrin drying system exhausts to either stack MP39 or MP40.

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,

A handwritten signature in cursive script that reads "Genevieve Damico".

Genevieve Damico
Chief
Air Permits Section