



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

MAY 18 2016

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 significant source modification and significant permit modification for Naturally Recycled Proteins of Indiana, LLC, permit numbers 009-36739-00025 and 009-36748-00025, respectively. 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 comment:

The table on page 3 of Appendix A of the technical support document (TSD) states that the particulate matter (PM) emission factors for the three hammermills (emission units EP3-1, EP3-2 and EP3-3) were derived from AP-42, Table 9.9.1-2 for Animal Feed Mills. Footnote (y) of Table 9.9.1-2 states that "PM-10 test data [for baghouse-controlled animal feed hammermills] are not available. PM-10 emission factors can be estimated by taking 100 percent of the filterable PM emission factor." However, the emission calculations for the TSD estimate that the hammermills' PM-10 and PM-2.5 emissions are equal to 50 percent of the filterable PM emission factor. We request that the permit record include justification for the use of the abovementioned PM-10 and PM-2.5 emission factors. Otherwise, we request that Indiana Department of Environmental Management recalculate the emissions using acceptable emission estimation methods, provide justification as appropriate, and revise the permit accordingly.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Paymon Danesh, of my staff, at (312) 886-6219.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico".  
Genevieve Damico  
Chief  
Air Permits Section