



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

JUN 28 2016

REPLY TO THE ATTENTION OF

MEMORANDUM

**SUBJECT:** Recommendation to Issue a Notice and Finding of Violation to  
Ingredion Incorporated, Bedford Park, Illinois

**FROM:** Sara Breneman  
Chief  
Air Enforcement and Compliance Assurance Branch

**TO:** Edward Nam  
Acting Director  
Air and Radiation Division

I recommend that you issue a Notice and Finding of Violation to Ingredion Incorporated for violating the Illinois State Implementation Plan (SIP), their Construction Permit 93010072 and provisions of their Title V Permit.

Specifically, Ingredion: exceeded emission rate limits and annual emission limits for PM at seven Gluten Rotary Filters, and exceeded emission rate limits for PM from the East and West Gluten Dryers; failed to maintain its baghouses and conduct expeditious repairs; failed to perform daily baghouse checks; failed to use the required housekeeping checklist; operated a wet feed pile without applying for or receiving a construction permit or operating permit; and failed to use appropriate emissions methodology and factors when calculating emissions from their coal storage pile.

This NOV/FOV follows an NOV issued on March 10, 2015, concerning sulfur dioxide emissions from the coal-fired boiler.

Attachment

State Representative Contacted:

Date:

By:

*Yasmine Keppner Bauman*  
*6/28/16*  
*Nathan Frank*



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

**JUN 30 2016**

REPLY TO THE ATTENTION OF

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Rob Mead  
Manager Environmental and Regulatory Affairs  
Ingredion Incorporated  
6400 South Archer Avenue  
Bedford Park, Illinois 60501

Re: Notice of Violation and Finding of Violation  
Ingredion Incorporated  
Bedford Park, Illinois

Dear Mr. Mead:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation and Finding of Violation (NOV/FOV) to Ingredion Incorporated (you) under Sections 113(a)(1) and 113(a)(3) of the Clean Air Act, 42 U.S.C. §§ 7413(a)(1) and (a)(3). We find that you have violated the Illinois State Implementation Plan, your Construction Permit 93010072 and provisions of your Title V Permit at your Bedford Park, Illinois, facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV/FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV/FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contacts in this matter are Eleanor Kane and Virginia Galinsky. You may call them at (312) 353-4840 or (312) 353-2089, respectively, to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,



Edward Nam  
Acting Director  
Air and Radiation Division

Enclosure

cc: Eric Jones, IEPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

<b>IN THE MATTER OF:</b>	)	
	)	
Ingredion Incorporated	)	<b>NOTICE AND FINDING OF</b>
Bedford Park, Illinois	)	<b>VIOLATION</b>
	)	
Proceedings Pursuant to	)	<b>EPA-5-16-IL-08</b>
Sections 113(a)(1) and (a)(3) of the	)	
Clean Air Act, 42 U.S.C.	)	
§§ 7413(a)(1) and (a)(3)	)	

**NOTICE AND FINDING OF VIOLATION**

The U.S. Environmental Protection Agency (EPA) is issuing this Notice of Violation and Finding of Violation (NOV/FOV) under Sections 113(a)(1) and (a)(3) of the Clean Air Act (the Act), 42 U.S.C. §§ 7413(a)(1) and (a)(3). EPA finds that Ingredion Incorporated (Ingredion) is violating the State of Illinois Air Pollution Implementation Plan (Illinois SIP), its Construction Permit 93010072, and conditions of its Title V Permit as follows:

**Statutory and Regulatory Background**

1. The Act is designed to protect and enhance the quality of the nation's air so as to promote the public health and welfare and the productive capacity of its populations. Section 101(b)(1) of the Act, 42 U.S.C. § 7401(b)(1).

**The Illinois State Implementation Plan**

2. Section 110 of the Act, 42 U.S.C. § 7410, requires each state to adopt and submit to EPA for approval a State Implementation Plan (SIP) that provides for the implementation, maintenance, and enforcement of the National Ambient Air Quality Standards (NAAQS).
3. Under Section 110(a)(2) of the Act, 42 U.S.C. § 7410(a)(2), each SIP must include a permit program to regulate the air pollution emissions of any stationary source as necessary to assure that NAAQS are achieved. Upon EPA approval, SIP requirements are federally enforceable under Section 113 of the Act, 42 U.S.C. § 7413.
4. Pursuant to Section 110(a) of the Act, 42 U.S.C. § 7401(a), on May 31, 1972, EPA approved Illinois Pollution Control Board (IPCB) Rule 103(a)(1)<sup>1</sup> as part of the Illinois SIP. (37 Fed. Reg. 10862). IPCB Rule 103(a)(1) states, among other things, that "[n]o person shall cause or allow the construction of any new emission source or any new air pollution control equipment, or cause or allow the modification of any existing emission source or air pollution control equipment, without first obtaining a construction permit

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<sup>1</sup> The State recodified this regulation as Rule 201.142, however, EPA has not approved the recodification.

from the Agency, except as provided in paragraph (i) of this Rule 103 [Section 201.146].”

5. Pursuant to Section 110(a) of the Act, 42 U.S.C. § 7401(a), on May 31, 1972, EPA approved IPCB Rule 103(b)(1)<sup>2</sup> as part of the Illinois SIP. (37 *Fed. Reg.* 10862). IPCB Rule 103(b)(1) states, among other things, that “[n]o person shall cause or allow the operation of any new emission source or new air pollution control equipment of a type for which a construction permit is required by paragraph (a) of this Rule 103 [Section 201.142] without first obtaining an operating permit from the Agency, except for such testing operations as may be authorized by the construction permit. Applications for operating permits shall be made at such times and contain such information (in addition to the information required by paragraph (b)(3) of this Rule 103 [Section 201.157]) as shall be specified in the construction permit.”
6. Pursuant to Section 110(a) of the Act, 42 U.S.C. § 7401(a), on February 21, 1980, EPA approved revisions to the Illinois SIP, including IPCB Rule 203(d)(9)<sup>3</sup> for grain handling and drying in general. (45 *Fed. Reg.* 11472). IPCB Rule 203(d)(9) addresses the visible emissions and particulate matter (PM) emissions from agricultural facilities, primarily from grain handling and grain drying operations. Specifically, IPCB Rule 203(d)(9)(A)(i) requires that all grain-handling and grain-drying operations, regardless of size, implement and use certain housekeeping practices, including that air pollution control devices shall be checked daily and cleaned as necessary to insure proper operation. Additionally, IPCB Rule 203(d)(9)(A)(vi) requires that housekeeping checklists to be developed by the Illinois Environmental Protection Agency (IEPA) shall be completed by the manager and maintained on the premises for inspection by IEPA personnel.
7. Pursuant to Section 110(a) of the Act, 42 U.S.C. § 7401(a), on March 11, 1998, EPA approved revisions to the Illinois SIP, including Illinois Environmental Protection Agency (IEPA) Rule 212 for PM emissions from process emission sources. (63 *Fed. Reg.* 11842). Specifically, IEPA Rule 212.324(f), provides that “[f]or any process emission unit subject to subsection (a), of this Section, the owner or operator shall maintain and repair air pollution control equipment in a manner that assures that applicable emission limits and standards shall be met at all times. This Section shall not affect the applicability of 35 Ill. Adm. Code 201.149. Proper maintenance shall include the following minimum requirements: (1) Visual inspection of air pollution control equipment; (2) Maintenance of an adequate inventory of spare parts; and (3) Expeditious repairs, unless the emission unit is shutdown.”

## Title V

8. Title V of the Act, 42 U.S.C. §§ 7661a-7661f, establishes an operating permit program for certain sources, including “major sources.”

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<sup>2</sup> The State recodified this regulation as Rule 201.143, however, EPA has not approved the recodification.

<sup>3</sup> The State recodified this regulation as Rule 212.461, however, EPA has not approved the recodification.

9. Section 502(a) of the Act, 42 U.S.C. § 7661a(a), states that “[a]fter the effective date of any permit program approved or promulgated under this subchapter, it shall be unlawful for any person to violate any requirement of a permit issued under this subchapter, or to operate...a major source...except in compliance with a permit issued by a permitting authority under this subchapter.”
10. Pursuant to Section 502(b) of the Act, 42 U.S.C. § 7661a(b), on July 21, 1992, EPA promulgated regulations establishing the minimum elements of a permit program to be administered by any air pollution control agency (*57 Fed. Reg.* 32295). These regulations are codified at 40 C.F.R. Part 70.
11. 40 C.F.R. § 70.2 defines “major source,” in part, as any stationary source belonging to a single major industrial grouping and that directly emits or has the potential to emit 100 tons per year (tpy) of any air pollutant, as defined under Section 302 of the Act, 42 U.S.C. § 7602.
12. 40 C.F.R. § 70.7(b) states that, with minor exceptions inapplicable to the violations alleged herein, “[n]o part 70 source may operate after the time that it is required to submit a timely and complete application under an approved permit program, except in compliance with a permit issued under a part 70 program.”
13. EPA gave final interim approval to the Illinois Title V Permit program, effective March 7, 1995. (*60 Fed. Reg.* 12478 (March 7, 1995)). EPA fully approved the Illinois Title V Permit program, effective November 30, 2001. (*66 Fed. Reg.* 62946 (December 4, 2001)). Illinois’ Title V Permit program requirements are codified in the Illinois Administrative Code (IAC) at Title 35, Part 270.

### **Permitting Background**

14. On December 21, 1994, IEPA issued Construction Permit 93010072 to Ingredion, formerly known as CPC International Inc. Corn Products – Argo Plant. The Construction Permit established emission limits for the Gluten Rotary Filters, the Main Exhaust Lines 1 and 2 from the Germ, Gluten, and Feed Drying Operations.
15. On March 21, 1997, IEPA issued Revised Construction Permit 93010072 to Ingredion, formerly known as CPC International Inc. Corn Products – Argo Plant. The Revised Construction Permit established emission limits for the Gluten Rotary Filters, the Main Exhaust Lines 1 and 2 from the Germ, Gluten, and Feed Drying Operations.
16. Condition 8a in both the Construction Permit and the Revised Construction Permit require Ingredion to operate, maintain and repair all air pollution equipment in a manner that assures that the emission limits set forth in Table 1 of those permits are met at all times.
17. Table 1 of the Construction Permit and the Revised Construction Permit limit PM emissions from each of seven Gluten Rotary Filters to 0.1 pounds per hour (lb/hr) and 0.43 tpy.

18. Table 1 of the Construction Permit and the Revised Construction Permit limit the combined PM emissions of Main Exhaust Lines 1 and 2 from the Germ, Gluten, and Feed Drying Operations to 17.62 lb/hr,
19. On June 2, 2000, the IEPA issued Title V Permit Number 96010009 (Title V Permit) to Ingredion with an expiration date of June 2, 2005.
20. On September 2, 2004, Ingredion submitted a renewal application for the Title V Permit Number 96010009.
21. The Title V Permit incorporates the PM emissions limit established in Construction Permit Number 93010072. Those limits are 0.1 lb/hr and 0.43 tpy for each of seven Gluten Rotary Filters and are set forth in Table 1A of the Title V Permit.
22. The Title V Permit incorporates the combined PM emissions limits of Main Exhaust Lines 1 and 2 from the Germ, Gluten, and Feed Drying Operations, established in Construction Permit Number 93010072. Those limits are 17.62 lb/hr and are set forth in Table 1A of the Title V Permit.
23. Condition 5.4 of the Title V Permit provides that “[f]or any process emission unit described in Condition 5.2.2(c), the owner or operator shall maintain and repair air pollution control equipment in a manner that assures that applicable emission limits and standards shall be met at all times. Proper maintenance shall include the following minimum requirements: (a) Visual inspection of air pollution control equipment; (b) Maintenance of an adequate inventory of spare parts; and (c) Expeditious repairs, unless the emission unit is shutdown.” *See also* 35 IAC 212.324(f).
24. Condition 5.2.2(c) of the Title V Permit describes the following process emission units: dextrose dryers, dextrose melt tank systems, bulk dextrose loading systems, house dry dextrose dust systems, dextrose bagging machine dust systems, dextrose expansion dryer/cooler and packaging systems, 2,034 dextrose dryer/cooler dust collecting systems, feed dryers, gluten dryers, germ dryers, heat recovery scrubbers, germ cake transport system, spent flake transport/cooling systems, bleaching clay systems, dust pickup bin systems in Building 26, pellet cooler systems, germ transport systems, starch dust collection systems, dicalite systems, starch processing/transport systems, starch dryers, starch transport systems, calcium carbonate storage systems, starch loading systems, corn unloading systems, germ transfer towers, dextrose transport systems, soda ash unloading systems, corn silo systems, filter aid systems, spent flake storage systems, corn cleaning transport systems, feed transport cooling systems, gluten cooling systems, gluten transport systems, feed dust systems, gluten dust systems, pellet dust systems, spent flake transport systems, rail car maintenance system building, and dextrose expansion milling and storage systems.
25. On June 3, 2004, IEPA issued Construction Permit number 03090020, allowing for the construction of a new coal-fired boiler and associated equipment at the Bedford Park facility (the 2004 Construction Permit).

26. Section 1.1 of the 2004 Construction Permit applies to the coal-fired boiler, also known as Boiler #10.
27. Condition 1.1.3.c.iii of the 2004 Construction Permit provides that, “[a]t all times, the Permittee shall maintain and operate the affected boiler, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to 40 CFR 60.11(d).”
28. Section 1.4 of the 2004 Construction Permit applies to the coal pile, among other emission units.
29. Condition 1.4.9(d) of the 2004 Construction Permit provides that “[t]he Permittee shall maintain records for the particulate matter emissions of the affected units based on operating data, the above records for the affected unit including data from the implementation of the operating program, and appropriate USEPA emission estimation methodology and emission factors, with supporting calculations.”

#### **Factual Background**

30. Ingredion is a corporation authorized to do business in Illinois.
31. Ingredion is a “person” as that term is defined in Section 302(e) of the Act, 42 U.S.C. § 7602(e).
32. At all times relevant to this NOV/FOV, Ingredion owned and operated a corn processing facility (the facility) at 6400 South Archer Avenue, Bedford Park, Illinois, located in Cook County.
33. The facility emits or has the potential to emit 100 tpy of a criteria air pollutant.
34. The facility includes grain handling and drying equipment subject to IPCB Rule 203(d)(9) of the Illinois SIP.
35. On September 18, 2014, EPA issued Ingredion a Request for Information under Section 114 of the Act (First Information Request) requiring Ingredion to provide certain information and perform emissions testing.
36. Between October 27, 2014, and May 22, 2015, Ingredion provided information responsive to the First Information Request in seven separate submittals.
37. On September 1, 2015, EPA issued Ingredion a second Request for Information under Section 114 of the Act (Second Information Request).
38. Between October 7, 2015, and January 22, 2016, Ingredion submitted four responses to the Second Information Request.

Gluten Rotary Filter Emissions

- 39. On April 9 and 10, 2015, Ingredion performed three runs of emissions testing using EPA Reference Method 5 to determine the PM emission rate at Gluten Rotary Filter #5. The testing measured a PM emission rate of 0.19 lb/hr.
- 40. Based on operating data provided by Ingredion in response to the Second Information Request and the emission rate established during testing, the annual emissions from Gluten Rotary Filter 5 were as follows:

<b>Year</b>	<b>Filter #5 Operating Hours</b>	<b>PM emissions (tpy)</b>
2010	7,892.67	0.75
2011	7,505.72	0.71
2012	7,695.64	0.73
2013	8,020.84	0.76
2014	7,842.57	0.75
2015*	5,734.20	0.54

\*For January 1, 2015 through September 30, 2015

- 41. Ingredion provided records in response to the First Information Request that demonstrates that Gluten Rotary Filters #1, 2, 3, 4, 6, and 7 are identical in design to Gluten Rotary Filter #5.

East and West Gluten Dryers Emissions

- 42. On March 18 and 19, 2015, Ingredion performed emissions testing for PM at the East and West Gluten Dryers using EPA Methods 5 and 202. The testing measured a combined emission rate of filterable PM from both dryers of 19.16 lb/hr.
- 43. On April 17 through April 20, 2015, Ingredion performed additional PM testing at the East and West Gluten Dryers using EPA Methods 5 and 202. During this test, the combined emission rate of filterable PM from both dryers was 10.00 lb/hr.

Baghouse Operations and Maintenance

- 44. Ingredion provided records in response to the Second Information Request that demonstrate that Ingredion does not use the baghouse manufacturer's recommended pressure drop to establish alarm set points. Ingredion frequently operated baghouses with a pressure drop less than 1.0 inch of water (below the manufacturer recommended range) and, in some cases, at a pressure drop below 0 inches of water. See Appendix A.
- 45. On numerous occasions from January 1, 2011 through September 30, 2015, Ingredion operated the Boiler 10 Baghouse with the pressure drop above the level at which Ingredion set an alarm. See Appendix A.

46. Ingedion provided records in response to the Second Information Request that demonstrate many instances where Ingedion failed to conduct expeditious repairs to its baghouses. Some examples include:
- a. Ingedion took 15 months (from February 2012 to May 2013) to refurbish conservation vents on the conditioning silo vent system (48A477);
  - b. Ingedion took 20 months (from November 2010 to September 2012) to rebuild drive assembly on 48A407 (B-Dryer baghouse);
  - c. Ingedion took 21 months (from November 2010 to October 2012) to replace diaphragms 1 and 2 on 48A437-01 (Fine Grade Bulk Silo dust collector);
  - d. Ingedion identified a hole in the top of the explosion door on the Wet Starch dust collector on January 31, 2014. Ingedion identified that the hole should be repaired within 2 days but did not complete the repair until June 2, 2014; and
  - e. Ingedion identified a hole in the bottom of the explosion door on the Wet Starch dust collector on June 14, 2014. Ingedion identified that the hole should be repaired within 2 days but did not complete the repair until August 28, 2014.

47. Ingedion provided records in response to the Second Information Request that demonstrate many instances where Ingedion failed to perform timely maintenance on its air pollution control equipment. Some examples include:

- a. As of October 7, 2015, Ingedion had not performed maintenance on the A48A20 Royal T Packing Bin baghouse since November 1, 2012, although Ingedion's maintenance scheduling system indicates that this unit should have annual maintenance;
- b. As of October 7, 2015, Ingedion had not performed maintenance on the A34A15 U2 Dust Extractor since July 1, 2014, although Ingedion's maintenance scheduling system indicates that this unit should have annual maintenance; and
- c. The following is a sampling of maintenance events Ingedion failed to conduct in the timeframe Ingedion identified as appropriate:

Maintenance Order Description	Order Creation Date	Priority Response Time Frame	Actual Completion Date
A / BAG-A034/1 - WET STARCH BAGHOUSE PM	4-25-11	1 month	3-13-13
A / BAG-A034/1 -WET STARCH BAGHOUSE PM	11-13-12	1 month	3-13-13
A / BAG-A034/1 -WET STARCH BAGHOUSE PM	4-8-12	1 month	3-13-13
A / BAG-A034/1 -WET STARCH BAGHOUSE PM	4-16-12	1 month	3-13-13
A / BAG-A034/1 -WET STARCH BAGHOUSE PM	4-8-12	1 month	3-13-13
A / BAG-A034/1 - WET STARCH BAGHOUSE PM	9-7-12	1 month	3-13-13
A / BAG-A007 /1 - PACKING DUST COLLECTOR BAG CHANGE.	2-27-14	1 month	7-9-14

A / BAG-A043/1 - DUST COLLECTOR P.M.	10-15-14	1 month	7-1-15
A / BAG-A043/1 -DUST COLLECTOR P.M.	4-14-14	1 month	7-1-14
A / BAG-A045/1 - U-2 PRODUCT RECIEVER (DUST COLLECTOR)	4-8-15	1 month	7-1-15
A / BAG-A009/1 - CHECK AIR BLOW DOWNS	4-11-14	1 week	10-27-14
A / BAG-A053/1 - C-BAGHOUSE P.M.,CHANGE ALL FILTER CARTS	6-25-15	1 month	8-18-15
A / BAG-A053 / 1 - C-BAGHOUSE P.M.,CHANGE ALL FILTER CARTS	6-30-14	1 month	11-20-14
A / BAG-A053/1 - C-BAGHOUSE P.M.,CHANGE ALL FILTER CARTS; INSPECT FILTERS	7-5-13	1 month	8-29-13
A / BAG-A053 / 1 - C-BAGHOUSE P.M.,CHANGE ALL FILTER CARTS; INSPECT BAGS	1-1-14	1 month	2-27-14
A / INS-A188 / 1-C DRYER DUST COLLECTOR PM.INST.	7-5-13	1 month	8-29-13
A / INS-A188 / 1- C DRYER DUST COLLECTOR PM.INST.	1-6-13	1 month	2-25-13

Grain Handling and Drying

- 48. Ingredient provided records in response to the Second Information Request, that demonstrate, prior to December 13, 2013, Ingredient failed to check the grain handling baghouses on a daily basis and, in some cases two months passed between checks.
- 49. The housekeeping checklist Ingredient uses to demonstrate compliance with IPCB Rule 203(d)(9) of the Illinois SIP is not the housekeeping checklist developed by the IEPA.

Wet Feed Storage Pile

- 50. Ingredient operates a wet feed storage pile, an emission source, at the facility, which is not included in the facility’s Title V Permit or any construction permit.

Coal Pile

- 51. Ingredient operates a coal storage pile, an emission source, at the facility. In calculating the amount of fugitive PM emissions from the coal storage pile, Ingredient utilized the EPA-published guidance for determining fugitive PM emissions from paved roads, rather than utilizing an appropriate USEPA-published emission estimation methodology and emission factors, with supporting calculations for a coal storage pile.

Violations

- 52. Ingredient violated its Construction Permit 93010072 and its Title V Permit by exceeding emission rate limits and annual emission limits for PM Gluten Rotary Filters # 1, 2, 3, 4, 5, 6, and 7, as outlined in paragraphs 39, 40, and 41, above.
- 53. Ingredient violated its Construction Permit 93010072 and Title V Permit by exceeding emission rate limits for PM from the East and West Gluten Dryers, as outlined in paragraph 42, above.

54. Ingression violated IEPA Rule 212.324(f) of the Illinois SIP and Condition 5.4 of the Title V Permit by failing to maintain its baghouses and conduct expeditious repairs, as outlined in paragraphs 44, 46, and 47, above.
55. Ingression violated Condition 1.1.3.c.iii of the 2004 Construction Permit by failing to maintain its Boiler 10 baghouse in a manner consistent with good engineering practices for minimizing emissions, as outlined in paragraph 45, above
56. Ingression violated IPCB Rule 203(d)(9) of the Illinois SIP by failing to perform daily baghouse checks and failing to use the required housekeeping checklist, as outlined in paragraphs 48 and 49, above.
57. Ingression violated IPCB Rules 103(a)(1) and (b)(1) of the Illinois SIP by operating a wet feed pile without applying for and receiving a construction permit and operating permit, as outlined in paragraph 50, above.
58. Ingression violated Condition 1.4.9(d) of the 2004 Construction Permit by failing to use appropriate emissions methodology and factors when calculating emissions from the coal storage pile, as outlined in paragraph 51, above.

**Environmental Impact of Violations**

59. These violations have caused excess emissions of PM. PM, especially fine particulates contains microscopic solids or liquid droplets, which can get deep into the lungs and cause serious health problems. PM exposure contributes to: irritation of the airways, coughing, and difficulty breathing; decreased lung function; aggravated asthma; chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease.

Date

6/30/16

  
Edward Nam  
Acting Director  
Air and Radiation Division

### Appendix A

Baghouse	Manufacturer Recommended Pressure Drop	Alarm Criteria	% of Time Alarmed	Hours Under 1.0 inch water	% time under 1.0 inch water	Hours Below 0 inches water	% time under 0 inches water
Feed mill hopper & Transport to storage Filter	1-6	>9.0 and rising	0.7%	891	10.5%	381	4.5%
Boiler 10		>7.5 for 15 min	14.1%	2	0.0%		
Fuel Crusher & conveyor A to B transfer Vent Filter	3-4	none		3,281	27.3%	2,340	19.4%
Germ Unloading Filter (fan 85A04)	3-5	>12	0.0%	21,345	93.6%	481	2.1%
D/C Baghouse (Fan 87A09)	3-5	>10	0.0%	37,537	95.8%	11	0.0%
Dry Prep Aspir Fan filter (fan 86A10)	3-5	>12	0.0%	39,765	100.0%	4,959	12.5%
Fluid Bed dryer (34D10 - 2nd Unidex)	1-6	none		10,904	97.6%	547	4.9%
2034 Sugar Dust Coll. System Filter	80-150 mm	none		8,459	75.5%	5,928	52.9%
Conditioning Silos - Bin Vent Filters 1	1-6	none		2,028	21.3%	0	0.0%
Conditioning Silos - Bin Vent Filters 2	1-6	none		2,219	21.6%	9	0.1%
Conditioning Silos - Bin Vent Filters 3	1-6	none		2,033	23.8%	0	0.0%
Conditioning Silos - Bin Vent Filters 4	1-6	none		1,890	34.0%	0	0.0%
2001 bulk sugar transport cyclone/ filter from A/B dryer	1-6	none		8,879	57.0%	4,326	27.8%
D Dryer 2001 Sugar Transport "Cyclone"-Filter	1-6	none		9,256	61.0%	9,216	60.8%
E Dryer 2001 Sugar Transport "Cyclone"-Filter	1-6	none		8,042	55.7%	7,993	55.4%
Conditioning Silos - Receiver Collector	3-4	none		6,552	19.3%	2,093	6.2%

CERTIFICATE OF MAILING

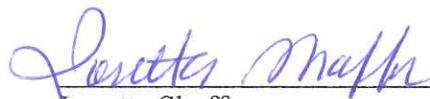
I, Loretta Shaffer, certify that I sent a Notice and Finding of Violation, No. EPA-5-16-IL-08, by Certified Mail, Return Receipt Requested, to:

Rob Mead  
Manager Environmental & Regulatory Affairs  
Ingredion Incorporated  
6400 South Archer Avenue  
Bedford Park, Illinois 60501

I also certify that I sent a copy of the Notice of Violation by first-class mail to:

Eric Jones, Manager  
Compliance Unit  
Bureau of Air  
Illinois Environmental Protection Agency  
P.O. Box 19506  
Springfield, Illinois 62794-9506

On the 30 day of June 2016.



\_\_\_\_\_  
Loretta Shaffer  
Program Technician  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7673 8040