

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT**



| SOURCE INFORMATION | |
|---------------------------|---|
| <u>SOURCE NAME</u> | United Animal Health, Inc. (Sheridan Mill) |
| <u>SOURCE LOCATION</u> | 4310 State Road 38 West, Sheridan, IN 46069 Hamilton County |
| <u>MAILING ADDRESS</u> | 322 S. Main Street, Sheridan, IN 46069 Hamilton County |
| <u>PLANT ID</u> | 057-00106 |
| <u>PERMIT INFORMATION</u> | Permit Type: MSOP Permit Number: 42545 Permit Expiration Date: 5/26/2025 VFC Document No.(hyperlink): 82973980 |
| <u>ATTAINMENT STATUS</u> | <input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO ₂ <input type="checkbox"/> CO <input type="checkbox"/> O ₃ <input type="checkbox"/> NO ₂ <input type="checkbox"/> Pb <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} |
| <u>SOURCE STATUS</u> | <input type="checkbox"/> PSD Major (326 IAC 2-2) <input type="checkbox"/> Major Source of HAPs <input type="checkbox"/> Emission Offset (326 IAC 2-3) <input checked="" type="checkbox"/> Area Source of HAPs <input type="checkbox"/> Acid Rain (326 IAC 21) |
| <u>SOURCE DESCRIPTION</u> | United Animal Health is a stationary animal feed mill that blends dry feed supplements for livestock by preparing both bagged and bulk feeds. |

| INSPECTION INFORMATION | | | |
|-----------------------------------|---|-------------------------|---------------------------|
| <u>INSPECTED BY</u> | Christopher Cissell | | |
| <u>INSPECTION DATE AND TIME</u> | 12/9/2020 | TIME IN: 1:50PM | TIME OUT: 2:35PM |
| <u>REPORTED BY</u> | Christopher Cissell | REPORT DATE: 12/14/2020 | |
| <u>COMPLIANCE PERIOD REVIEWED</u> | May 2020 to December 2020 | | |
| <u>INSPECTION NOTIFICATION</u> | <input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced: | | |
| <u>INSPECTION OBJECTIVE(S)</u> | <input type="checkbox"/> Compliance Monitoring Strategy (CMS) <input checked="" type="checkbox"/> Commitment <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Complaint <input type="checkbox"/> Other: <input type="checkbox"/> Surveillance | | |
| <u>ACES TRACKING NUMBER(S)</u> | Inspection: 253093 | Complaint: | Violation/Warning: 253108 |
| <u>RM TRACKING NUMBER(S)</u> | Complaint: | | |
| <u>INSPECTION BACKGROUND</u> | This was the first inspection by IDEM at this site. | | |

| SOURCE PERSONNEL INTERVIEWED | | | |
|------------------------------|----------------------------------|---------------------|--|
| <i>Name</i> | <i>Title</i> | <i>Phone Number</i> | <i>Email Address</i> |
| Dylan Reagan | Dispatch and Delivery Supervisor | 317-758-2666 | dylan.reagan@unitedanh.com |

| INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS) | | | |
|---|----------------------------------|---------------|-----------------|
| <i>Date</i> | <i>Inspection/Complaint Type</i> | <i>Result</i> | <i>Comments</i> |
| N/A | N/A | N/A | N/A |

| COMPLIANCE HISTORY (PREVIOUS 5 YEARS) | | | |
|--|-------------------------|--|------------------------------|
| Informal Enforcement Actions | | | |
| <i>Date Issued</i> | <i>Action Taken</i> | <i>Describe Violation(s)</i> | |
| 4/8/2020 | Violation Letter | Construction and operation of Minor source without permit. | |
| Formal Enforcement Actions | | | |
| <i>Case Number</i> | <i>Enforcement Type</i> | <i>Civil Penalty</i> | <i>Describe Violation(s)</i> |
| N/A | N/A | \$ N/A | N/A |
| Other Relevant Actions | | | |
| <i>Action Taken</i> | <i>Comments</i> | | |
| N/A | N/A | | |

| PERMIT SECTION D.1 | | | |
|--|---|---|-----------------|
| Emission Units and Control Devices: | | | |
| <ul style="list-style-type: none"> One (1) handling system with conveyors and feed cleaner, controlled by a baghouse, exhausting to stack; and One (1) bagging station, exhausting indoors. | | | |
| Pollutants with Emission Limits or Applicable Standards: | | | |
| <input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input checked="" type="checkbox"/> PM ₁₀ <input checked="" type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS | | | |
| Applicable Rules: | | | |
| <ul style="list-style-type: none"> 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) | | | |
| Requirement: | Applicable | Violation Noted | |
| Emission Limitations and Standards | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Preventive Maintenance Plan | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Compliance Determination Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Testing Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Compliance Monitoring Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Recordkeeping Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Types of Records Reviewed: | | | |
| Reporting Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Observations and Comments: | | | |
| The equipment was observed in operation with no adverse visible emissions noted. Mr. Reagan indicated that a gauge is equipped to the dust collector, which indicates when to replace the filters. | | | |
| <i>Emission Unit or Control Device</i> | <i>Parameter</i> | <i>Permitted Value/Range</i> | <i>Observed</i> |
| N/A | N/A | N/A | N/A |
| Permit Section Compliance Status: | | | |
| <input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. | | | |
| <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection: | | | |
| <i>Condition/Citation</i> | <i>Comments</i> | | |
| | | | |

| PERMIT SECTION D.2 | | | |
|---|---|---|------------------|
| Emission Units and Control Devices: | | | |
| <ul style="list-style-type: none"> Two (2) parts washers with a maximum capacity of 145 gallons per year, each. | | | |
| Pollutants with Emission Limits or Applicable Standards: | | | |
| <input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS | | | |
| Applicable Rules: | | | |
| <ul style="list-style-type: none"> 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements) 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers) | | | |
| Requirement: | Applicable | Violation Noted | |
| Emission Limitations and Standards | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Preventive Maintenance Plan | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Compliance Determination Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Testing Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Compliance Monitoring Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Recordkeeping Requirements | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Types of Records Reviewed: Solvent Supplier/Usage and SDS Records | | | |
| Reporting Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Observations and Comments: | | | |
| Heritage Crystal Clean maintains the units and has consistently manifested a 30-gallon drum about once every three months. The unit in the maintenance department does not get used much. The safety data sheet (SDS) (Attachment 1) indicates a vapor pressure of 0.2 mm Hg, which is below the limit. | | | |
| <i>Emission Unit or Control Device</i> | <i>Parameter</i> | <i>Permitted Value/Range</i> | <i>Observed</i> |
| Parts Washer(s) | Solvent Vapor Pressure | 1.0 mm Hg @ 20°C | 0.2 mm Hg @ 20°C |
| Permit Section Compliance Status: | | | |
| <input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection: | | | |
| <i>Condition/Citation</i> | <i>Comments</i> | | |
| | | | |

| PERMIT SECTION E.1 | | | |
|--|---|---|-----------------|
| Emission Units and Control Devices: | | | |
| <ul style="list-style-type: none"> One (1) 60 kW/hr. diesel-fired emergency generator, constructed in 2014, manufactured in December 2013. | | | |
| Pollutants with Emission Limits or Applicable Standards: | | | |
| <input checked="" type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input checked="" type="checkbox"/> CO <input type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS | | | |
| Applicable Rules: | | | |
| <ul style="list-style-type: none"> 40 CFR 60, Subpart IIII (NSPS for Stationary Compression Ignition Internal Combustion Engines) | | | |
| Requirement: | Applicable | Violation Noted | |
| Emission Limitations and Standards | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Preventive Maintenance Plan | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Compliance Determination Requirements | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Testing Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Compliance Monitoring Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Recordkeeping Requirements | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Types of Records Reviewed: Hours of operation and maintenance records | | | |
| Reporting Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Observations and Comments: | | | |
| The generator was observed to have a total operating time of 255.9 hours and is regularly maintained by Generact. The unit has a label affixed to verify that it was certified to meet the emission standards as required. | | | |
| <i>Emission Unit or Control Device</i> | <i>Parameter</i> | <i>Permitted Value/Range</i> | <i>Observed</i> |
| N/A | N/A | N/A | N/A |
| Permit Section Compliance Status: | | | |
| <input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. | | | |
| <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection: | | | |
| <i>Condition/Citation</i> | <i>Comments</i> | | |
| | | | |

| PERMIT SECTION E.2 | | | |
|--|---|---|-----------------|
| Emission Units and Control Devices: | | | |
| <ul style="list-style-type: none"> One (1) receiving station, controlled by a baghouse, exhausting to stack; Sixteen (16) storage bins for storing received materials, exhausting outdoors; One (1) unloading station, controlled by a baghouse, exhausting to stack; One (1) mixing station, controlled by a baghouse, exhausting to stack; One (1) handling system with conveyors and feed cleaner, controlled by a baghouse, exhausting to stack; Thirty-six (36) storage bins for storing finished product, controlled by a baghouse, exhausting to stack; One (1) bagging station, exhausting indoors; and One (1) shipping station, controlled by a baghouse, exhausting to stack. | | | |
| Pollutants with Emission Limits or Applicable Standards: | | | |
| <input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input checked="" type="checkbox"/> HAPS | | | |
| Applicable Rules: | | | |
| <ul style="list-style-type: none"> 40 CFR 63, Subpart DDDDDDD (NESHAP for Prepared Feeds Manufacturing) | | | |
| Requirement: | Applicable | Violation Noted | |
| Emission Limitations and Standards | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Preventive Maintenance Plan | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Compliance Determination Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Testing Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Compliance Monitoring Requirements | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| Recordkeeping Requirements | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| Types of Records Reviewed: | | | |
| Reporting Requirements | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Observations and Comments: | | | |
| <p>According to Mr. Reagan, the source uses plastic "socks" to reduce the distance between the bulk loadout and the truck being loaded. These socks are replaced when they become damaged and do not adequately control the fugitive emissions. The source was not aware that there was a monthly requirement to conduct inspections of these devices and did not maintain records as required. Additionally, bags of materials are kept closed when not in use and housekeeping measures are taken by sweeping and wiping down surfaces on a regular basis.</p> | | | |
| <i>Emission Unit or Control Device</i> | <i>Parameter</i> | <i>Permitted Value/Range</i> | <i>Observed</i> |
| N/A | N/A | N/A | N/A |
| Permit Section Compliance Status: | | | |
| <input type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. | | | |
| <input checked="" type="checkbox"/> The following violations were determined for this permit section at the time of the inspection: | | | |
| <i>Condition/Citation</i> | <i>Comments</i> | | |
| 40 CFR 63.11622(a) | Failed to conduct monthly inspections of bulk loadout device(s). | | |
| 40 CFR 63.11624(c)(3) | Failed to maintain records associated with inspections of bulk loadout device(s). | | |

| PERMIT SECTION E.3 | | | |
|--|---|---|-----------------|
| Emission Units and Control Devices: | | | |
| <ul style="list-style-type: none"> One (1) 60 kW/hr. diesel-fired emergency generator, constructed in 2014, manufactured in December 2013. | | | |
| Pollutants with Emission Limits or Applicable Standards: | | | |
| <input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input checked="" type="checkbox"/> HAPS | | | |
| Applicable Rules: | | | |
| <ul style="list-style-type: none"> 40 CFR 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines) | | | |
| Requirement: | Applicable | Violation Noted | |
| Emission Limitations and Standards | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Preventive Maintenance Plan | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Compliance Determination Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Testing Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Compliance Monitoring Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Recordkeeping Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Types of Records Reviewed: | | | |
| Reporting Requirements | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Observations and Comments: | | | |
| The source must comply with the requirements of 40 CFR 60, Subpart IIII to comply with the requirements of 40 CFR 63, Subpart ZZZZ. | | | |
| <i>Emission Unit or Control Device</i> | <i>Parameter</i> | <i>Permitted Value/Range</i> | <i>Observed</i> |
| N/A | N/A | N/A | N/A |
| Permit Section Compliance Status: | | | |
| <input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection: | | | |
| <i>Condition/Citation</i> | <i>Comments</i> | | |
| | | | |

| ADDITIONAL SOURCE COMPLIANCE REVIEW: | |
|---|--|
| The following reports are required and were reviewed: | |
| <input type="checkbox"/> Annual Compliance Certification(s) <input type="checkbox"/> Deviation & Compliance Monitoring Report(s) <input checked="" type="checkbox"/> Annual Notification(s) <input type="checkbox"/> Emission Statement(s) | |
| The reports are consistent with inspection observations. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |
| The permit accurately represents emission units observed on site. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |
| Compliance assistance was provided during the inspection. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |
| The source is required to have a Risk Management Plan [40 CFR 68]. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| If yes, the source has a plan. | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A |
| If yes, the employees have been trained. | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A |
| Additional Information and Comments: | |
| The source was made aware that the first annual notification is due no later than 3/1/2021. | |
| Additional Source Compliance Review Status: | |
| <input checked="" type="checkbox"/> No violations were observed or determined at the time of the inspection. <input type="checkbox"/> The following violations were determined at the time of the inspection: | |
| <i>Condition/Citation</i> | <i>Description of Violation(s)</i> |
| | |

| INSPECTION FINDINGS | |
|---|--|
| <input type="checkbox"/> No violations were observed or determined at the time of the inspection. | |
| <input checked="" type="checkbox"/> The following violations were determined at the time of the inspection: | |
| <i>Condition/Citation</i> | <i>Description of Violation(s)</i> |
| 40 CFR 63.11622(a) | Failed to conduct monthly inspections of bulk loadout device(s). |
| 40 CFR 63.11624(c)(3) | Failed to maintain records associated with inspections of bulk loadout device(s). |
| RECOMMENDED ACTION | Issue inspection summary/violation letter. |
| EXIT INTERVIEW | I explained my findings, recommendations, and conclusions with Mr. Reagan prior to exiting the facility. |

Attachment 1: Solvent Safety Data Sheet