

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) Renewal
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**ADM Milling Company
854 Bethel Avenue
Beech Grove, Indiana 46107**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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| Operation Permit No.: F097-14650-00016 | |
| Originally Signed by: John B. Chavez, Administrator Office of Environmental Services | Issuance Date: July 21, 2003 Expiration Date: July 20, 2008 |

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Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.2 Parametric Monitoring

D.2.3 Baghouse Inspections

D.2.4 Broken or Failed Bag Detection

D.2.5 Visible Emissions Notations

D.2.6 Preventative Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

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- D.3.1 Particulate Matter [326 IAC 2-8-4] [40 CFR 60.302, Subpart DD] [326 IAC 6-1-2]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.3.2 Parametric Monitoring
- D.3.3 Baghouse Inspections
- D.3.4 Broken or Failed Bag Detection
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- D.4.1 Particulate Matter [326 IAC 2-8-4] [40 CFR 60.302, Subpart DD] [326 IAC 6-1-2]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.4.2 Parametric Monitoring
- D.4.3 Baghouse Inspections
- D.4.4 Broken or Failed Bag Detection
- D.4.5 Visible Emissions Notations
- D.4.6 Preventative Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

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- D.5.1 Particulate Matter [326 IAC 2-8-4] [40 CFR 60.302, Subpart DD] [326 IAC 6-1-2]

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- D.5.2 Parametric Monitoring
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- D.6.1 Particulate Matter [326 IAC 2-8-4] [40 CFR 60.302, Subpart DD] [326 IAC 6-1-2]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.6.2 Parametric Monitoring
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- D.6.5 Visible Emissions Notations
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- D.7.1 Particulate Matter [326 IAC 2-8-4] [40 CFR 60.302, Subpart DD] [326 IAC 6-1-2]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.7.2 Parametric Monitoring
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- D.7.5 Visible Emissions Notations
- D.7.6 Preventative Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

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- D.8.1 Particular Emission Limitations for Sources of Indirect Heating (PM) [326 IAC 6-2-4]
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Certification Form

Emergency Occurrence Form

Quarterly Deviation and Compliance Monitoring Form

Quarterly Report Form

Quarterly Report Form

Quarterly Report Form

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary source for the operation of a grain elevator and flour mill.

| | |
|-------------------------|--|
| Authorized Individual: | Plant Manager |
| Source Address: | 854 Bethel Avenue, Beech Grove, Indiana 46107 |
| Mailing Address: | 854 Bethel Avenue, Beech Grove, Indiana 46107 |
| General Source Phone: | (317) 263-0548 |
| SIC Code: | 2041 |
| Source Location Status: | Marion |
| County Status: | Attainment for all criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of Clean Air Act |

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Grain receiving area, identified as emission unit ES1, was installed in 1992. Grain receiving is separated into areas and enclosures for both truck and railcar receiving. Truck unloading is aspirated to a baghouse, identified as CD1. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.
- (b) Grain loadout, identified as emission unit ES2, was installed in 1992. Grain loadout is separated into areas and enclosures for both truck and railcar loadout. Railcar loading is aspirated to a baghouse, identified as CD2. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.
- (c) Grain storage and handling, identified as ES3, was installed in 1992 and consists of 123 bins, conveyors, transfer points and the grain dryer. 123 bins have a total storage capacity of 5,835,000 bushels, and are controlled by three (3) baghouses, identified as CD3, CD4, and CD5. The grain dryer is fired with natural gas and has a heat input capacity of 19.98 MMBtu per hour. The maximum throughput capacity for the grain dryer is 56 tons per hour. Fugitive emissions from grain handling are controlled by enclosed conveyors and transfer points.
- (d) Cleaning house, identified as emission unit ES4, was installed in 1992. The wheat cleaning house is controlled by seven (7) baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, and CD12.

- (e) Mill house, identified as emission unit ES5, was installed in 1992. The mill house consists of skimmers, stream blenders, purifiers, rollstands, stock hoppers, pinmills, and hammermills. The mill house is controlled by twelve (12) baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, and CD24.
- (f) Bulk plant and product loadout, identified as emission unit ES6, was installed in 1992. The flour bulk plant includes a bagging operation, loadout bins, sifters, and scales, with an enclosed loadout area for bulk shipment via trucks and railcars. Bulk plant and product loadout is controlled by seven (7) baghouses, identified as CD25, CD26, CD27, CD28, CD29, CD30, and CD31.
- (g) Mill feed storage, handling and loadout, identified as emission unit ES7, was installed in 1992 and consists of screening bins, feed bins, conveying and loadout. The mill feed storage, handling and loadout is controlled by five (5) baghouses, identified as CD32, CD33, CD34, CD35, and CD36.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Five (5) natural gas-fired combustion sources with heat input less than ten million Btu per hour (326 IAC 6-2-4);
- (b) A gasoline transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage tank of less than 10,500 gallons;
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank of less than 10,500 gallon capacity, and dispensing less than 230,000 gallons per month;
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (e) Degreasing operations that do not exceed 145 gallons per 12 months (326 IAC 8-3-5);
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other filtration equipment;
- (g) Paved and unpaved roads and parking lots with public access (326 IAC 6-4);
- (h) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower; and
- (i) A laboratory as defined in 326 IAC 2-7-1(21)(D).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and/or OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and OES copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and/or OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and/or OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and/or OES may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ and/or OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and/or OES. IDEM, OAQ and/or OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and/or OES within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or OES, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

OES

Telephone No.: 317/327-2234
Facsimile No.: 317/327-2274

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and/or OES may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ or OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality (Data Compliance Section)
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or OES determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ and/or OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or OES may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and/or OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and/or OES on or before the date it is due.
- (2) If IDEM, OAQ and/or OES upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and/or OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and OES any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and OES in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ and/or OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for O AQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9

or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality (Compliance Data Section)
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and/or OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records and Reports [326 IAC 2-7-5]
[326 IAC 2-8-4]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The emission statement does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and/or OES on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “authorized individual” as defined by 326 IAC2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality (Compliance Data Section)
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and/or OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Grain receiving area, identified as emission unit ES1, was installed in 1992. Grain receiving is separated into areas and enclosures for both truck and railcar receiving. Truck unloading is aspirated to a baghouse, identified as CD1. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter [326 IAC 2-8-4] [40 CFR 60.302, Subpart DD] [326 IAC 6-1-2] [326 IAC 12]

- (a) Emissions from the truck unloading station shall be controlled by one (1) baghouse identified as unit CD1 with a design flow rate of 18,100 acfm. Pursuant to 326 IAC 2-8-4, the emission rate from baghouse CD1 shall not exceed 0.01 gr/dscf. Compliance with this condition will satisfy the requirements of 326 IAC 6-1-2(d)(1) (Particulate Emission Limitations), 40 CFR 60.302(b)(1), and the requirement to restrict sourcewide PM and PM-10 emissions to less than one hundred (100.0) tons per twelve consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.
- (b) Fugitive emissions shall not exhibit greater than five percent opacity pursuant to 40 CFR 60.302(c)(1). Process emissions shall not exhibit greater than zero percent opacity pursuant to 40 CFR 60.302(b)(2). Compliance with this condition will satisfy the requirements of 326 IAC 6-1-2(d)(2)(C).
- (c) All grain receiving operations shall be conducted such that fugitive emissions are controlled by the three-sided enclosure.
- (d) The throughput is restricted to 1,716,000 tons of grain received per twelve consecutive month period with compliance determined at the end of each month. This throughput limitation is equivalent to PM-10 emissions of 12.87 tons per twelve consecutive month period. Compliance with this limit shall make the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.
- (e) Pursuant to 326 IAC 6-1-2(d)(2) (Particulate Emission Limitations), the following shall be provided:
 - (1) Good housekeeping practices conducted in the following areas or operations:
 - (A) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floor decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentrations; and grain driers with respect to accumulated particulate matter.
 - (B) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.
 - (C) Dust from driveway, access roads, and other areas of travel be controlled.

- (D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
- (2) Good equipment maintenance will be those procedures which eliminate or minimize emissions from equipment or a system caused by:
 - (A) Malfunctions.
 - (B) Breakdowns.
 - (C) Improper adjustments.
 - (D) Operation above rated or designed capacity.
 - (E) Not following designed operating specifications.
 - (F) Lack of good preventive maintenance care.
 - (G) Lack of critical and proper spare replacement parts on hand.
 - (H) Lack of properly trained and experienced personnel.
- (f) Compliance with the requirements listed under Conditions D.1.1, D.2.2, D.3.1, D.4.1, D.5.1, D.6.1, and D.7.1 shall make the requirements of 326 IAC 2-8 not applicable.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.2 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse CD1 used in conjunction with ES1, at least once per shift when ES1 is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

D.1.3 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling ES1. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.4 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the ES1 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission unit ES1.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 (d), the Permittee shall maintain records of the amount of grain received per twelve (12) consecutive month period. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the particulate emission limits established in Condition D.1.1.
- (b) To document compliance with Condition D.1.2 Parametric Monitoring, the Permittee shall maintain records of the total static pressure drop across the baghouse used in conjunction with the dryer burner, at least once per shift when the dryer burner is in operation when venting to the atmosphere.
- (c) To document compliance with Condition D.1.3 Baghouse Inspections, the Permittee shall maintain quarterly records of the inspections performed on all bags controlling the dryer burner when venting to the atmosphere.
- (d) To document compliance with Condition D.1.5 Visible Emissions Notations, the Permittee shall maintain records of visible emission notations, performed once per shift, of the stack exhaust.

- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 (d) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Grain loadout, identified as emission unit ES2, was installed in 1992. Grain loadout is separated into areas and enclosures for both truck and railcar loadout. Railcar loading is aspirated to a baghouse, identified as CD2. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter [326 IAC 2-8-4] [40 CFR 60.302, Subpart DD] [326 IAC 6-1-2] [326 IAC 12]

- (a) Emissions from the truck unloading station shall be controlled by one (1) baghouse identified as unit CD2 with a design flow rate of 8,447 acfm. Pursuant to 326 IAC 2-8-4, the emission rate from baghouse CD2 shall not exceed 0.01 gr/dscf. Compliance with this condition will satisfy the requirements of 326 IAC 6-1-2(d)(1) (Particulate Emission Limitations), 40 CFR 60.302(b)(1), and the requirement to restrict sourcewide PM and PM-10 emissions to less than one hundred (100.0) tons per twelve consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.
- (b) Fugitive emissions from the truck loadout station and the railcar loadout station shall not exhibit greater than 10 percent and 5 percent opacity, respectively, pursuant to 40 CFR 60.302(c)(1) and (3). Process emissions shall not exhibit greater than zero percent opacity pursuant to 40 CFR 60.302(b)(2). Compliance with this condition will satisfy the requirements of 326 IAC 6-1-2(d)(2)(C).
- (c) All grain loadout operations shall be conducted such that fugitive emissions are controlled by the three-sided enclosure.
- (d) The throughput is restricted to 1,560,000 tons of grain loaded per twelve consecutive month period with compliance determined at the end of each month. This throughput limitation is equivalent to PM-10 emissions of 2.34 tons per twelve consecutive month period. Compliance with this limit shall make the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.
- (e) Pursuant to 326 IAC 6-1-2(d)(2) (Particulate Emission Limitations), the following shall be provided:
 - (1) Good housekeeping practices conducted in the following areas or operations:
 - (A) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floor decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentrations; and grain driers with respect to accumulated particulate matter.
 - (B) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.
 - (C) Dust from driveway, access roads, and other areas of travel be controlled.

- (D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
- (2) Good equipment maintenance will be those procedures which eliminate or minimize emissions from equipment or a system caused by:
 - (A) Malfunctions.
 - (B) Breakdowns.
 - (C) Improper adjustments.
 - (D) Operation above rated or designed capacity.
 - (E) Not following designed operating specifications.
 - (F) Lack of good preventive maintenance care.
 - (G) Lack of critical and proper spare replacement parts on hand.
 - (H) Lack of properly trained and experienced personnel.
- (f) Compliance with the requirements listed under Conditions D.1.1, D.2.2, D.3.1, D.4.1, D.5.1, D.6.1, and D.7.1 shall make the requirements of 326 IAC 2-8 not applicable.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.2 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse CD2 used in conjunction with ES2, at least once per shift when ES2 is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

D.2.3 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling ES2. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.4 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the ES2 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission unit ES2.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1 (d), the Permittee shall maintain records of the amount of grain loaded per twelve (12) consecutive month period. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the particulate emission limits established in Condition D.2.1.
- (b) To document compliance with Condition D.2.2 Parametric Monitoring, the Permittee shall maintain records of the total static pressure drop across the baghouse used in conjunction with the dryer burner, at least once per shift when the dryer burner is in operation when venting to the atmosphere.
- (c) To document compliance with Condition D.2.3 Baghouse Inspections, the Permittee shall maintain quarterly records of the inspections performed on all bags controlling the dryer burner when venting to the atmosphere.
- (d) To document compliance with Condition D.2.5 Visible Emissions Notations, the Permittee shall maintain records of visible emission notations, performed once per shift, of the stack exhaust.

- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 (d) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Grain storage and handling, identified as ES3, was installed in 1992 and consists of 123 bins, conveyors, transfer points and the grain dryer. 123 bins have a total storage capacity of 5,835,000 bushels, and are controlled by three (3) baghouses, identified as CD3, CD4, and CD5. The grain dryer is fired with natural gas and has a heat input capacity of 19.98 MMBtu per hour. The maximum throughput capacity for the grain dryer is 56 tons per hour. Fugitive emissions from grain handling are controlled by enclosed conveyors and transfer points.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter [326 IAC 2-8-4] [40 CFR 60.302, Subpart DD] [326 IAC 6-1-2] [326 IAC 12]

- (a) Emissions from the grain storage and handling shall be controlled by three (3) baghouses identified as units CD3, CD4, and CD5 with design flow rates of 12,100 acfm, 17,000 acfm, and 7,200 acfm, respectively. Pursuant to 326 IAC 2-8-4, the emission rates from baghouses CD3, CD4, and CD5 shall not exceed 0.01 gr/dscf. Compliance with this condition will satisfy the requirements of 326 IAC 6-1-2(d)(1) (Particulate Emission Limitations), 40 CFR 60.302(b)(1) for units CD3 and CD4 only, and the requirement to restrict sourcewide PM and PM-10 emissions to less than one hundred (100.0) tons per twelve consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.
- (b) Emissions from any grain handling operations, as defined in 40 CFR 60.301(l) shall not exhibit greater than zero percent opacity, pursuant to 40 CFR 60.302(c)(2). Process emissions from CD3 and CD4 shall not exhibit greater than zero percent opacity 40 CFR 60.302(b)(2). Process emissions from CD5 and the Grain Dryer shall not exhibit greater than twenty percent opacity pursuant to 326 IAC 6-1-2(d)(2)(C).
- (c) Pursuant to 326 IAC 6-1-2(d)(2) (Particulate Emission Limitations), the following shall be provided:
 - (1) Good housekeeping practices conducted in the following areas or operations:
 - (A) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floor decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentrations; and grain driers with respect to accumulated particulate matter.
 - (B) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.
 - (C) Dust from driveway, access roads, and other areas of travel be controlled.
 - (D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
 - (2) Good equipment maintenance will be those procedures which eliminate or minimize emissions from equipment or a system caused by:

- (A) Malfunctions.
 - (B) Breakdowns.
 - (C) Improper adjustments.
 - (D) Operation above rated or designed capacity.
 - (E) Not following designed operating specifications.
 - (F) Lack of good preventive maintenance care.
 - (G) Lack of critical and proper spare replacement parts on hand.
 - (H) Lack of properly trained and experienced personnel.
- (f) Compliance with the requirements listed under Conditions D.1.1, D.2.2, D.3.1, D.4.1, D.5.1, D.6.1, and D.7.1 shall make the requirements of 326 IAC 2-8 not applicable.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.2 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse CD3, CD4, and CD5 used in conjunction with ES3, at least once per shift when ES3 is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

D.3.3 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling ES3. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.3.4 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been

repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.3.5 Visible Emissions Notations

- (a) Visible emission notations of the ES3 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.3.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission unit ES3.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.2 Parametric Monitoring, the Permittee shall maintain records of the total static pressure drop across the baghouse used in conjunction with the dryer burner, at least once per shift when the dryer burner is in operation when venting to the atmosphere.
- (b) To document compliance with Condition D.3.3 Baghouse Inspections, the Permittee shall maintain quarterly records of the inspections performed on all bags controlling the dryer burner when venting to the atmosphere.
- (c) To document compliance with Condition D.3.5 Visible Emissions Notations, the Permittee shall maintain records of visible emission notations, performed once per shift, of the stack exhaust.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Cleaning house, identified as emission unit ES4, was installed in 1992. The wheat cleaning house is controlled by seven (7) baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, and CD12.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Matter [326 IAC 2-8-4] [326 IAC 6-1-2]

- (a) Emissions from the cleaning house shall be controlled by seven (7) baghouses identified as units CD6, CD7, CD8, CD9, CD10, CD11, and CD12 with a design flow rate of 5,625 acfm; 5,625 acfm, 7,500 acfm, 7,500 acfm, 7,500 acfm, 5,625 acfm, and 5,625 acfm, respectively. Pursuant to 326 IAC 2-8-4, the emission rate from baghouses CD6 - CD12 shall not exceed 0.005 gr/dscf or 0.24 pounds per hour, 0.24 pounds per hour, 0.32 pounds per hour, 0.32 pounds per hour, 0.32 pounds per hour, 0.24 pounds per hour, and 0.24 pounds per hour, respectively. Compliance with this condition will satisfy the requirements of 326 IAC 6-1-2(d)(1) (Particulate Emission Limitations) and the requirement to restrict sourcewide PM and PM-10 emissions to less than one hundred (100.0) tons per twelve consecutive month period with compliance determined at the end of each month, such that the requirements 326 IAC 2-7 (Part 70 Permit Program) do not apply.
- (b) Compliance with the requirements listed under Conditions D.1.1, D.2.2, D.3.1, D.4.1, D.5.1, D.6.1, and D.7.1 shall make the requirements of 326 IAC 2-8 not applicable.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.4.2 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse CD6 - CD12 used in conjunction with ES4, at least once per shift when ES4 is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

D.4.3 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling ES4. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.4.4 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.4.5 Visible Emissions Notations

- (a) Visible emission notations of the ES4 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.4.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission unit ES4.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.4.7 Record Keeping Requirements

- (a) To document compliance with Condition D.4.2 Parametric Monitoring, the Permittee shall maintain records of the total static pressure drop across the baghouse used in conjunction with the dryer burner, at least once per shift when the dryer burner is in operation when venting to the atmosphere.

- (b) To document compliance with Condition D.4.3 Baghouse Inspections, the Permittee shall maintain quarterly records of the inspections performed on all bags controlling the dryer burner when venting to the atmosphere.
- (c) To document compliance with Condition D.4.5 Visible Emissions Notations, the Permittee shall maintain records of visible emission notations, performed once per shift, of the stack exhaust.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Mill house, identified as emission unit ES5, was installed in 1992. The mill house consists of skimmers, stream blenders, purifiers, rollstands, stock hoppers, pinmills, and hammermills. The mill house is controlled by twelve (12) baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, and CD24.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 Particulate Matter [326 IAC 2-8-4] [326 IAC 6-1-2]

- (a) Emissions from the mill house shall be controlled by twelve (12) baghouses identified as units CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, and CD24 with design flow rates of 15,876 acfm, 4,536 acfm, 4,536 acfm, 13,608 acfm, 15,694 acfm, 12,604 acfm, 17,014 acfm, 4,253 acfm, 4,253 acfm, 4,253 acfm, 8,507 acfm, and 3,864 acfm, respectively. Pursuant to 326 IAC 2-8-4, the emission rates from baghouses CD13 - CD24 shall not exceed 0.005 gr/dscf, or 0.68 pounds per hour, 0.19 pounds per hour, 0.19 pounds per hour, 0.58 pounds per hour, 0.67 pounds per hour, 0.54 pounds per hour, 0.73 pounds per hour, 0.18 pounds per hour, 0.18 pounds per hour, 0.18 pounds per hour, 0.36 pounds per hour, and 0.17 pounds per hour, respectively. Compliance with this condition will satisfy the requirements of 326 IAC 6-1-2(d)(1) (Particulate Emission Limitations) and the requirement to restrict sourcewide PM and PM-10 emissions to less than one hundred (100.0) tons per twelve consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.
- (b) Compliance with the requirements listed under Conditions D.1.1, D.2.2, D.3.1, D.4.1, D.5.1, D.6.1, and D.7.1 shall make the requirements of 326 IAC 2-8 not applicable.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.5.2 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse CD13 - CD24 used in conjunction with ES5, at least once per shift when ES5 is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

D.5.3 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling ES5. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.5.4 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.5.5 Visible Emissions Notations

- (a) Visible emission notations of the ES5 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.5.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission unit ES5.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.5.7 Record Keeping Requirements

- (a) To document compliance with Condition D.5.2 Parametric Monitoring, the Permittee shall maintain records of the total static pressure drop across the baghouse used in conjunction with the dryer burner, at least once per shift when the dryer burner is in operation when venting to the atmosphere.

- (b) To document compliance with Condition D.5.3 Baghouse Inspections, the Permittee shall maintain quarterly records of the inspections performed on all bags controlling the dryer burner when venting to the atmosphere.
- (c) To document compliance with Condition D.5.5 Visible Emissions Notations, the Permittee shall maintain records of visible emission notations, performed once per shift, of the stack exhaust.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Bulk plant and product loadout, identified as emission unit ES6, was installed in 1992. The flour bulk plant includes a bagging operation, loadout bins, sifters, and scales, with an enclosed loadout area for bulk shipment via trucks and railcars. Bulk plant and product loadout is controlled by seven (7) baghouses, identified as CD25, CD26, CD27, CD28, CD29, CD30, and CD31.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.6.1 Particulate Matter [326 IAC 2-8-4] [326 IAC 6-1-2]

- (a) Emissions from the bulk plant and product loadout shall be controlled by seven (7) baghouses identified as units CD25, CD26, CD27, CD28, CD29, CD30, and CD31 with a design flow rates of 22,250 acfm, 600 acfm, 600 acfm, 9,100 acfm, 893 acfm, 893 acfm, and 664 acfm, respectively. Pursuant to 326 IAC 2-8-4, the emission rates from baghouses CD25 - CD31 shall not exceed 0.005 gr/dscf or 0.95 pounds per hour, 0.026 pounds per hour, 0.026 pounds per hour, 0.39 pounds per hour, 0.038 pounds per hour, 0.038 pounds per hour, and 0.028 pounds per hour, respectively. Compliance with this condition will satisfy the requirements of 326 IAC 6-1-2(d)(1) (Particulate Emissions Limitations) and the requirement to restrict sourcewide PM and PM-10 emissions to less than one hundred (100.0) tons per twelve consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.
- (b) Compliance with the requirements listed under Conditions D.1.1, D.2.2, D.3.1, D.4.1, D.5.1, D.6.1, and D.7.1 shall make the requirements of 326 IAC 2-8 not applicable.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.6.2 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse CD25 - CD31 used in conjunction with ES6, at least once per shift when ES6 is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

D.6.3 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling ES6. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.6.4 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.6.5 Visible Emissions Notations

- (a) Visible emission notations of the ES6 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.6.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission unit ES6.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.6.7 Record Keeping Requirements

- (a) To document compliance with Condition D.6.2 Parametric Monitoring, the Permittee shall maintain records of the total static pressure drop across the baghouse used in conjunction

with the dryer burner, at least once per shift when the dryer burner is in operation when venting to the atmosphere.

- (b) To document compliance with Condition D.6.3 Baghouse Inspections, the Permittee shall maintain quarterly records of the inspections performed on all bags controlling the dryer burner when venting to the atmosphere.
- (c) To document compliance with Condition D.6.5 Visible Emissions Notations, the Permittee shall maintain records of visible emission notations, performed once per shift, of the stack exhaust.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Mill feed storage, handling and loadout, identified as emission unit ES7, was installed in 1992 and consists of screening bins, feed bins, conveying and loadout. The mill feed storage, handling and loadout is controlled by four (4) baghouses, identified as CD32, CD33, CD34, CD35, and CD36. (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.7.1 Particulate Matter [326 IAC 2-8-4] [40 CFR 60.302, Subpart DD] [326 IAC 6-1-2] [326 IAC 12]

- (a) Emissions from the mill feed storage, handling and loadout shall be controlled by four (4) baghouses identified as unit CD32, CD33, CD 34, and CD35 with a design flow rates of 1,600 acfm, 2,000 acfm, 5,200 acfm, and 400 acfm, respectively. Pursuant to 326 IAC 2-8-4, the emission rate from baghouses CD32 - CD35 shall not exceed 0.01 gr/dscf, or 0.14 pounds per hour, 0.17 pounds per hour, 0.45 pounds per hour, and 0.03 pounds per hour, respectively. Compliance with this condition will satisfy the requirements of 326 IAC 6-1-2(d)(1) (Particulate Emissions Limitations) and the requirement to restrict sourcewide PM and PM-10 emissions to less than one hundred (100.0) tons per twelve consecutive month period with compliance determined at the end of each month, such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.
- (b) All mill feed loadout operations shall be conducted such that fugitive emissions are controlled by the three-sided enclosure.
- (c) The throughput is restricted to 249,600 tons of feed loaded out per twelve consecutive month period with compliance determined at the end of each month. This throughput limitation is equivalent to PM-10 emissions of 4.99 tons per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.
- (d) Compliance with the requirements listed under Conditions D.1.1, D.2.2, D.3.1, D.4.1, D.5.1, D.6.1, and D.7.1 shall make the requirements of 326 IAC 2-8 not applicable.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.7.2 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse CD32 - CD35 used in conjunction with ES7, at least once per shift when ES7 is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

D.7.3 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling ES7. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.7.4 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.7.5 Visible Emissions Notations

- (a) Visible emission notations of the ES7 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.7.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission unit ES7.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.7.7 Record Keeping Requirements

- (a) To document compliance with Condition D.7.1 (c), the Permittee shall maintain records of the amount of feed loaded per twelve (12) consecutive month period. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the particulate emission limits established in Condition D.7.1.
- (b) To document compliance with Condition D.7.2 Parametric Monitoring, the Permittee shall maintain records of the total static pressure drop across the baghouse used in conjunction with the dryer burner, at least once per shift when the dryer burner is in operation when venting to the atmosphere.
- (c) To document compliance with Condition D.7.3 Baghouse Inspections, the Permittee shall maintain quarterly records of the inspections performed on all bags controlling the dryer burner when venting to the atmosphere.
- (d) To document compliance with Condition D.7.5 Visible Emissions Notations, the Permittee shall maintain records of visible emission notations, performed once per shift, of the stack exhaust.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.7.1 (c) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (1) Five (5) natural gas-fired combustion sources with heat input less than ten million Btu per hour;
 - (2) Degreasing operations that do not exceed 145 gallons per 12 months.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.8.1 Particular Emission Limitations for Sources of Indirect Heating (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the two (2) 5.0 MMBtu per hour heat input boilers, one (1) 3.3 MMBtu per hour boiler, one (1) 1.2 MMBtu per hour boiler, and one (1) 0.99 MMBtu per hour boiler shall be limited to 0.53 pounds per hour.

This limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

D.8.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Mailing Address: P.O. Box 610, Beech Grove, Indiana, 46107
FESOP No.: 097-14650-00016

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES
DATA COMPLIANCE
2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone:317-327-2234
Fax:317-327-2274**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Mailing Address: P.O. Box 610, Beech Grove, Indiana, 46107
FESOP No.: 097-14650-00016

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |

If any of the following are not applicable, mark N/A

Page 2 of 2

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE of ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: ADM Milling Company
 Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
 Mailing Address: P.O. Box 610, Beech Grove, Indiana, 46107
 FESOP No.: 097-14650-00016

Months: _____ **to** _____ **Year:** _____

| | |
|--|-------------------------------|
| This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period". | |
| 9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| 9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

| | |
|--|-------------------------------|
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE of ENVIRONMENTAL SERVICES**

FESOP Quarterly Report

Source Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Mailing Address: P.O. Box 610, Beech Grove, Indiana, 46107
FESOP No.: 097-14650-00016
Facility: ES1 (Grain Receiving)
Parameter: PM-10 Emissions
Limit: Throughput limited to 1,716,000 tons of grain received per 12 consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|----------------------------------|--|--------------------------------------|
| | Grain Received This Month (tons) | Grain Received Previous 11 Months (tons) | Grain Received 12 Month Total (tons) |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE of ENVIRONMENTAL SERVICES**

FESOP Quarterly Report

Source Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Mailing Address: P.O. Box 610, Beech Grove, Indiana, 46107
FESOP No.: 097-14650-00016
Facility: ES2 (Grain Loading)
Parameter: PM-10 Emissions
Limit: Throughput limited to 1,560,000 tons of grain received per 12 consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|--------------------------------|--|------------------------------------|
| | Grain Loaded This Month (tons) | Grain Loaded Previous 11 Months (tons) | Grain Loaded 12 Month Total (tons) |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE of ENVIRONMENTAL SERVICES**

FESOP Quarterly Report

Source Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Mailing Address: P.O. Box 610, Beech Grove, Indiana, 46107
FESOP No.: 097-14650-00016
Facility: ES7 (Feed Loadout)
Parameter: PM-10 Emissions
Limit: Throughput limited to 249,600 tons of feed loadout per 12 consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|--------------------------------|--|------------------------------------|
| | Feed Loadout This Month (tons) | Feed Loadout Previous 11 Months (tons) | Feed Loadout 12 Month Total (tons) |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name: ADM Milling Company
Source Location: 854 Bethel Avenue, Beech Grove, Indiana, 46107
County: Marion
SIC Code: 2041
Operation Permit No.: 097-14650-00016
Permit Reviewer: N. Olsen

The Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) have reviewed a FESOP renewal application from ADM Milling Company relating to the operation of a grain elevator and flour mill. ADM Milling Company was issued FESOP 097-6761-00016 on April 10, 1997.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Grain receiving area, identified as emission unit ES1, was installed in 1992. Grain receiving is separated into areas and enclosures for both truck and railcar receiving. Truck unloading is aspirated to a baghouse, identified as CD1. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.
- (b) Grain loadout, identified as emission unit ES2, was installed in 1992. Grain loadout is separated into areas and enclosures for both truck and railcar loadout. Railcar loading is aspirated to a baghouse, identified as CD2. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.
- (c) Grain storage and handling, identified as ES3, was installed in 1992 and consists of 123 bins, conveyors, transfer points and the grain dryer. 123 bins have a total storage capacity of 5,835,000 bushels, and are controlled by three (3) baghouses, identified as CD3, CD4, and CD5. The grain dryer is fired with natural gas and has a heat input capacity of 19.98 MMBtu per hour. The maximum throughput capacity for the grain dryer is 56 tons per hour. Fugitive emissions from grain handling are controlled by enclosed conveyors and transfer points.
- (d) Cleaning house, identified as emission unit ES4, was installed in 1992. The wheat cleaning house is controlled by seven (7) baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, and CD12.
- (e) Mill house, identified as emission unit ES5, was installed in 1992. The mill house consists of skimmers, stream blenders, purifiers, rollstands, stock hoppers, pinmills, and hammermills. The mill house is controlled by twelve (12) baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, and CD24.

- (f) Bulk plant and product loadout, identified as emission unit ES6, was installed in 1992. The flour bulk plant includes a bagging operation, loadout bins, sifters, and scales, with an enclosed loadout area for bulk shipment via trucks and railcars. Bulk plant and product loadout is controlled by seven (7) baghouses, identified as CD25, CD26, CD27, CD28, CD29, CD30, and CD31.
- (g) Mill feed storage, handling and loadout, identified as emission unit ES7, was installed in 1992 and consists of screening bins, feed bins, conveying and loadout. The mill feed storage, handling and loadout is controlled by four (4) baghouses, identified as CD32, CD33, CD34, CD35, and CD36.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

- (a) Five (5) natural gas-fired combustion sources with heat input less than ten million Btu per hour (326 IAC 6-2-4);
- (b) A gasoline transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage tank of less than 10,500 gallons;
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank of less than 10,500 gallon capacity, and dispensing less than 230,000 gallons per month;
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (e) Degreasing operations that do not exceed 145 gallons per 12 months (326 IAC 8-3-5);
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other filtration equipment;
- (g) Paved and unpaved roads and parking lots with public access (326 IAC 6-4);
- (h) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower; and
- (i) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) FESOP 097-6761-00016, issued on April 10, 1997; and expiring on April 10, 2002, and;

The following conditions and subsequent report forms were removed from this Renewal:

- (1) D.1.5 Grain Receiving Records
Compliance with condition number D.1.1(d) shall be demonstrated by either of the record keeping described by conditions (a) or (b).
 - (a) Grain received shall not exceed 1,573,000 tons of grain received per 12 consecutive month rolling sum, rolled monthly.

D.2.5 Grain Load Out Records

Compliance with condition number D.2.1(d) shall be demonstrated by either of the record keeping described by conditions (a) or (b).

- (a) Grain loaded out shall not exceed 1,430,000 tons of grain loaded out per 12 consecutive month rolling sum, rolled monthly.

D.7.5 Feed Load Out Records

Compliance with condition number D.7.1(c) shall be demonstrated by either of the record keeping described by conditions (a) or (b).

- (a) Feed loaded out shall not exceed 228,800 tons of feed loaded out per 12 consecutive month rolling sum, rolled monthly.

Reason not incorporated: The original FESOP included two limitations for grain received, grain loadout, and feed loadout. One of the limits was calculated using a 365 day rolling sum (rolled daily). The other limit was calculated using a 12 consecutive month rolling sum (rolled monthly), but applied an "11/12ths" option for limiting PTE. The 11/12ths was an option for limiting PTE when the source wanted a 12 month rolling limit. Another option is to take the full limit (12/12ths) which required daily record keeping or fixed monthly limit. This approach allowed sources to use simpler recordkeeping and reporting when there was an adequate margin between expected maximum actual emissions and the relevant limit on potential to emit (PTE). Due to recent EPA guidance, OES will no longer use the 11/12ths limit. OES will use a fixed (flat or variable) monthly limit or 12-consecutive months limit. The report forms have been changed to reflect the PTE limitations of a 12-consecutive month limit with compliance determined at the end of each month. The daily report forms have been removed.

The following changes have been incorporated into this Renewal:

- (1) The original FESOP did not include particulate limitations for the five (5) boilers listed in the insignificant activities. These units are subject to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because the source is located in Marion County and the natural gas fired boilers (each with heat input less than 10 mmBtu/hr) were constructed in 1994, which is after the applicability date of September 21, 1983. Condition D.8.1 (Particulate Emission Limitations for Sources of Indirect Heating) has been added to this Renewal which limits the particulate emissions from the two (2) 5.0 MMBtu per hour heat input boilers, one (1) 3.3 MMBtu per hour boiler, one (1) 1.2 MMBtu per hour boiler, and one (1) 0.99 MMBtu per hour boiler to 0.53 pounds per hour.
- (2) The original FESOP did not subject the degreasing operations (listed as an insignificant activity) to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control). However, the source is subject to 326 IAC 8-3-5 because the degreaser was constructed after 1980. The owner or operator of this degreaser facility shall ensure that the control equipment requirements listed under Condition D.8.2 (Volatile Organic Compounds) of this Renewal are met.

Emission Calculations

Emission calculations for this source can be found in Appendix A, pages 1 through 2 of 2.

Recommendation

The staff recommends to the Administrator that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.
 An administratively complete FESOP Renewal application for the purposes of this review was received on July 11, 2001.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

| Pollutant | Unrestricted Potential Emissions (tons/yr) |
|-----------------|--|
| PM | Greater than 100 |
| PM-10 | Greater than 100 |
| SO ₂ | Neg |
| VOC | Neg |
| CO | Neg |
| NO _x | Neg |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's | Unrestricted Potential Emissions (tons/yr) |
|----------------|--|
| Individual HAP | Neg |
| Combined HAPs | Neg |

- (a) The unrestricted emissions of particulate matter (PM) and particulate matter less than 10 micron (PM-10) is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since this type of operation is not one of the listed source categories under 326 IAC 2-2-1(w), but there are applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on April 10, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. The source's potential to emit is based on the emission units included in the original FESOP (F097-6761-00016; issued on April 10, 1997).

| Process/ facility | Potential to Emit After Issuance (tons/year) | | | | | | |
|----------------------------------|--|----------------------|-----------------|------|------|-----------------|------|
| | PM | PM-10 | SO ₂ | VOC | CO | NO _x | HAPs |
| ES1 - Grain Receiving | 12.87 ^(a) | 12.87 ^(a) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| ES2 - Grain Loadout | 3.17 | 3.17 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| ES3 - Grain Storage and Handling | 13.63 | 13.63 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| ES4 - Cleaning House | 8.45 | 8.45 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

| Process/ facility | Potential to Emit After Issuance (tons/year) | | | | | | |
|---|--|------------------------|-----------------|-------------|-------------|-----------------|-------------|
| | PM | PM-10 | SO ₂ | VOC | CO | NO _x | HAPs |
| ES5 - Mill House | 20.46 | 20.46 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| ES6 - Bulk Plant and Product Loadout | 6.57 | 6.57 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| ES7 - Feed Storage, Handling, and Loadout | 3.45 | 3.45 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Fugitive | | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| F1- Grain Receiving | 2.68 ^(a) | 2.68 ^(a) | | | | | |
| F2- Grain Loadout | 9.05 ^(a) | 9.05 ^(a) | | | | | |
| F3- Bin Vents | 5.41 ^(a) | 5.41 ^(a) | | | | | |
| F4- Grain Dryer | 14.16 ^(a,b) | 14.16 ^(a,b) | | | | | |
| F5- Feed Loadout | 0.004 ^(c) | 0.004 ^(c) | | | | | |
| Total Emissions | 99.64 | 99.64 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

(a) AP42 9.9.1, Grain Elevators and Processes, Table 9.9.1-1, April 2003.

(b) AP42 1.4, Natural Gas Combustion, Table 1.4-2, July 1998.

(c) AP42 9.9.1, Grain Elevators and Processes, Table 9.9.1-2, April 2003. This factor for animal feed mills, feed shipping, non-control, bulk feed (not pellets).

County Attainment Status

The source is located in Marion County.

| Pollutant | Status |
|-----------------|----------------|
| PM-10 | attainment |
| SO ₂ | maintenance |
| NO ₂ | attainment |
| Ozone | maintenance |
| CO | attainment |
| Lead | unclassifiable |

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The flour mill and grain elevator operations are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.300-304, Subpart DD) because this source operates a grain storage elevator with grain storage capacity greater than 35,200 m³ (ca. 1 million bushels). This regulation establishes particulate limits and opacity limits for the grain elevator portions of this source. Those include the grain receiving (ES1), grain loadout (ES2) and grain storage and a limited number of facilities within handling (ES3) operations.

(b) The two (2) storage tanks used as fuel transfer and dispensing facilities and listed as insignificant activities are not subject to the NSPS, 40 CFR Part 60.110b through 60.117b, Subpart Kb (326 IAC 12) because this rule only applies to storage vessels with capacity greater than or equal to forty (40) cubic meters (m³) and these storage vessels have capacity less than forty (40) m³.

(c) The five (5) natural gas fired boilers are not subject to the NSPS, 40 CFR Part 60.40c, Subpart Dc because although construction of each boiler commenced in 1994, which is

after the applicability date of June 9, 1989, each boiler has a maximum heat input capacity that is less than 10 million Btu/hr.

- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.
 - (1) The cold degreasing operations are not subject to 40 CFR Part 63.460, Subpart T (NESHAPs) (326 IAC 14 and 40 CFR Part 63) because the source does not operate a batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine utilizing halogenated solvents.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has a federally enforceable potential to emit which restricts PM-10 emissions to less than one hundred (100) tons per year, thus 326 IAC 1-5-2 does not apply.

326 IAC 1-6-3 (Preventative Maintenance Plan)

Pursuant to 326 IAC 1-6-1 and 326 IAC 1-6-3, a Preventative Maintenance Plan (PMP) should have been developed for each facility that was formerly permitted as a registration level. Since this source is regulated under 326 IAC 2-8 IDEM, OAQ and OES have established the following guidelines for determining if a facility is required to develop a PMP:

Preventative Maintenance Plans (PMP) are required for all emitting units which emit PM, SO₂, or VOC with existing applicable requirements and;

- (a) a NSPS or NESHAP applies; or
- (b) the unit has a control device and allowable emissions exceed 10 pounds per hour; or
- (c) the unit does not have a control and actual emissions exceed 25 tons per year; or
- (d) the unit would have been subject to an applicable requirement if there was not a condition limiting the PTE

Based on IDEM, OAQ and OES review, a PMP is required for emission units ES1, ES2, and ES3 because the units are subject to a NSPS (40 CFR 60.300-304, Subpart DD).

A PMP is not required for emission units ES4, ES5, ES6, or ES7 because the units have a control and allowable emissions do not exceed 10 pounds per hour.

326 IAC 2-2-2 (Prevention of Significant Deterioration)

The source commenced construction in 1992 which is after the applicability date of August 7, 1977. However, this source is not one of the twenty-eight (28) listed sources under 326 IAC 2-2-1(w) and the source was not previously subject to the requirements of 326 IAC 2-2-2 (PSD). The potential PM and PM-10 emissions from the grain elevator and flour milling operations are greater than major threshold levels, however actual PM and PM-10 emissions have never exceeded major threshold levels. The source has accepted limits such that the requirements of 326 IAC 2-2 and 40 CFR 52.21 (PSD) do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because the source is located in Marion County and it has the potential to emit more than one hundred (100) tons per year of PM-10. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received by April 15 of each year, in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, source wide emissions of PM-10 shall be limited to less than one hundred (100) tons per year such that it does not fall within any of the categories listed in 326 IAC 2-7-2(a) and that assure compliance with all applicable requirements at the time of FESOP issuance.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the source is subject to this rule because the source is located in Marion County, except for the area of Washington Township east of Fall Creek and the area of Franklin Township south of Thompson Road and east of Five Points Road. Thus, opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4. Compliance with 40 CFR Part 60.90, Subpart I satisfies the requirement for 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-2 (Particulate Matter)

The source is subject to 326 IAC 6-1-2(a) because the source is located in Marion County, has actual PM emissions greater than ten (10) tons per year, and the plant is a grain elevator (as described under 326 IAC 6-1-2(d)) that was constructed after the applicability date of January 13, 1977. Pursuant to this rule, particulate matter emissions from the dryer burner shall not exceed 0.03 grains per dry standard cubic foot (gr/dcsf). The baghouse shall be in operation at all times the dryer burner is in operation, in order to comply with this limit.

The source is subject to the good housekeeping and good maintenance procedures described under 326 IAC 6-1-2(d)(2) because the grain storage elevator located at this grain processing source has a permanent grain storage capacity of thirty-five thousand two hundred (35,200) cubic meters and a grain terminal elevator with a permanent grain storage capacity of eighty-eight thousand one hundred (88,100) cubic meters. The requirements are as follows:

- (a) Good housekeeping practices conducted in the following areas or operations:
 - (1) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floor decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentrations; and grain driers with respect to accumulated particulate matter.
 - (2) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.
 - (3) Dust from driveway, access roads, and other areas of travel be controlled.
 - (4) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
- (b) Good equipment maintenance will be those procedures which eliminate or minimize emissions from equipment or a system caused by:

- (1) Malfunctions.
- (2) Breakdowns.
- (3) Improper adjustments.
- (4) Operation above rated or designed capacity.
- (5) Not following designed operating specifications.
- (6) Lack of good preventive maintenance care.
- (7) Lack of critical and proper spare replacement parts on hand.
- (8) Lack of properly trained and experienced personnel.

State Rule Applicability - Insignificant Activities

Degreaser

326 IAC 8-3-2 (Cold Cleaner Operation)

The source is not subject to 326 IAC 8-3-2 because although the degreaser was constructed after 1980 and is located in Marion County, the source does not have potential sourcewide VOC emissions of greater than one hundred (100) tons per year.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The source is subject to 326 IAC 8-3-5 because the degreaser was constructed after 1980.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32)

millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Combustion Sources

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The source is subject to the provisions of 326 IAC 6-2-1(d) because it is located in Marion County and the five (5) natural gas fired boilers (each with heat input less than 10 mmBtu/hr) were constructed in 1994, which is after the applicability date of September 21, 1983. Pursuant to 326 IAC 6-2-4, particulate emissions from indirect heating facilities shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26} = 1.09/15.5^{0.26} = 0.53 \text{ lb/hr}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million Btu per hour mmBtu/hr) heat input.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D

of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

- (1) The grain receiving, grain loadout, grain storage and handling, cleaning house, mill house, bulk plant and product loadout, and feed storage, handling and loadout processes controlled by fabric filters have applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of the process emissions from this facility shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across all baghouse units controlling the grain elevator and flour mill operations, at least once per shift⁸ when the grain elevator and flour mill is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across all baghouse units shall be maintained within the range of 2.0 to 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary in order to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 6-3, and avoid becoming a major PSD source under 326 IAC 2-2.

Conclusion

The operation of a grain elevator and flour mill shall be subject to the conditions of the attached proposed FESOP Renewal No.: F097-14650-00016.

APPENDIX A

Point Source Emissions

Company Name: ADM Milling Company
Street Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
County: Marion County
Operation Permit No.: 097-14650-00016
Reviewer: N. Olsen

| Emitting Unit | Control Device ID | gr/dscf | Flow Rate dscfm | Operating Hours hr/yr | PM-10 Emissions | | PM-10 Emis. per Emitting Unit tons/yr |
|---|-------------------|---------|-----------------|-----------------------|-----------------|---------|---------------------------------------|
| | | | | | lbs/hr | tons/yr | |
| ES1 - Grain Receiving (truck) | CD1 | 0.01 | 18100 | 8760 | 1.55 | 6.80 | 6.80 |
| ES2 - Grain Loadout | CD2 | 0.01 | 8447 | 8760 | 0.72 | 3.17 | 3.17 |
| ES3 - Grain Storage and handling | CD3 | 0.01 | 12100 | 8760 | 1.04 | 4.54 | 13.63 |
| | CD4 | 0.01 | 17000 | 8760 | 1.46 | 6.38 | |
| | CD5 | 0.01 | 7200 | 8760 | 0.62 | 2.70 | |
| ES4 - Cleaning House | CD6 | 0.005 | 5625 | 8760 | 0.24 | 1.06 | 8.45 |
| | CD7 | 0.005 | 5625 | 8760 | 0.24 | 1.06 | |
| | CD8 | 0.005 | 7500 | 8760 | 0.32 | 1.41 | |
| | CD9 | 0.005 | 7500 | 8760 | 0.32 | 1.41 | |
| | CD10 | 0.005 | 7500 | 8760 | 0.32 | 1.41 | |
| | CD11 | 0.005 | 5625 | 8760 | 0.24 | 1.06 | |
| ES5 - Mill House | CD12 | 0.005 | 5625 | 8760 | 0.24 | 1.06 | 20.46 |
| | CD13 | 0.005 | 15876 | 8760 | 0.68 | 2.98 | |
| | CD14 | 0.005 | 4536 | 8760 | 0.19 | 0.85 | |
| | CD15 | 0.005 | 4536 | 8760 | 0.19 | 0.85 | |
| | CD16 | 0.005 | 13608 | 8760 | 0.58 | 2.55 | |
| | CD17 | 0.005 | 15694 | 8760 | 0.67 | 2.95 | |
| | CD18 | 0.005 | 12604 | 8760 | 0.54 | 2.37 | |
| | CD19 | 0.005 | 17014 | 8760 | 0.73 | 3.19 | |
| | CD20 | 0.005 | 4253 | 8760 | 0.18 | 0.80 | |
| | CD21 | 0.005 | 4253 | 8760 | 0.18 | 0.80 | |
| | CD22 | 0.005 | 4253 | 8760 | 0.18 | 0.80 | |
| ES6 - Bulk Plant and Product Loadout | CD23 | 0.005 | 8507 | 8760 | 0.36 | 1.60 | 6.57 |
| | CD24 | 0.005 | 3864 | 8760 | 0.17 | 0.73 | |
| | CD25 | 0.005 | 22250 | 8760 | 0.95 | 4.18 | |
| | CD26 | 0.005 | 600 | 8760 | 0.026 | 0.11 | |
| | CD27 | 0.005 | 600 | 8760 | 0.026 | 0.11 | |
| | CD28 | 0.005 | 9100 | 8760 | 0.39 | 1.71 | |
| | CD29 | 0.005 | 893 | 8760 | 0.038 | 0.17 | |
| ES7 - Feed Storage, Handling, and Loadout | CD30 | 0.005 | 893 | 8760 | 0.038 | 0.17 | 3.45 |
| | CD31 | 0.005 | 664 | 8760 | 0.028 | 0.12 | |
| | CD32 | 0.01 | 1600 | 8760 | 0.14 | 0.60 | |
| | CD33 | 0.01 | 2000 | 8760 | 0.17 | 0.75 | |
| | CD34 | 0.01 | 5200 | 8760 | 0.45 | 1.95 | |
| | CD35 | 0.01 | 400 | 8760 | 0.03 | 0.15 | |

Fugitive Emissions

| Emission Unit ID | Emissions Unit Description | Control Device | Control Efficiency | Option | | Emissions Factor lbs/ton | Option | |
|------------------|----------------------------|-----------------------|--------------------|------------------------------|------------------------------|--------------------------|-------------------------------|-------------------------------|
| | | | | Potential Throughput tons/yr | Potential Throughput tons/yr | | Option 1 PM Emissions tons/yr | Option 2 PM Emissions tons/yr |
| ES1 (Fug1) | Railcar Grain Receiving | 3-sided enclosure | 60.00% | 1716000 | 1573000 | 0.0078 | 2.68 | 2.45 |
| ES2 (Fug2) | Truck Grain Loadout | 3-sided enclosure | 60.00% | 1560000 | 1430000 | 0.029 | 9.05 | 8.29 |
| ES3 (Fug3) | Elevator Bin Vents | none | 0.00% | 1716000 | 1573000 | 0.0063 | 5.41 | 4.95 |
| ES3 (Fug4) | Grain Dryer | none | 0.00% | 490560 | NA | 0.055 | 13.49 | 13.49 |
| ES3 (Fug4) | Grain Dryer (combustion) | none | 0.00% | 175 (c) | NA | 7.6 | 1.20 | 1.20 |
| ES7 (Fug5) | Feed Loadout Fugitives | 3-sided enclosure (a) | 96.00% | 249600 | 228800 | 0.004 | 0.02 | 0.02 |

(a) 90% of emissions are captured by aspiration; 60% of uncaptured emissions are controlled by a three sided enclosure.

(b) Emissions Factors are from AP-42, a dustiness ratio of 2.5

(c) MMcf

(d) lbs/MMcf

Total Source Potential to Emit

Company Name: ADM Milling Company
Street Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
County: Marion County
Operation Permit No.: 097-14650-00016
Reviewer: N. Olsen

| Emissions Unit ID | Point tons/yr | Option 1(c) Fugitive tons/yr | Option 2(d) Fugitive tons/yr |
|-------------------|------------------|------------------------------------|------------------------------------|
| ES1 | (a) | 2.68 | 2.45 |
| ES2 | 3.17 | (b) | (b) |
| ES3 | 13.63 | 20.09 | 19.64 |
| ES4 | 8.45 | 0.00 | 0.00 |
| ES5 | 20.46 | 0.00 | 0.00 |
| ES6 | 6.57 | 0.00 | 0.00 |
| ES7 | 3.45 | 0.02 | 0.02 |

Total Source Emissions Option 1 78.52
 Total Source Emissions Option 2 77.85

- (a) assume worst case all grain is recieved by railcar
 (b) assume worst case all gain loadout is by truck
 (c) option 1 is based on 365 days rolling sum throughput cap
 (d) option 1 is based on 12 month rolling sum throughput cap