

February 28, 2003

RE: **MONSANTO GLOBAL SEED 159-15902-00010**
TO: Interested Parties / Applicant
FROM: *Paul Dubenetzky*
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure



Governor

Lori F. Kaplan
Commissioner

6015

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-

(317) 232-8603
(800) 451-6027
www.state.in.us/idem

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Monsanto Global Seed Company
908 North Independence
Windfall, Indiana 46076**

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

Operation Permit No.: MSOP 159-15902-00010	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 28, 2003 Expiration Date: February 28, 2008

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates stationary soybean processing plant.

Authorized Individual: Site Manager
Source Address: 908 North Independence, Windfall, Indiana 46076
Mailing Address: 908 North Independence, Windfall, Indiana 46076
General Source Phone: 765-945-7121
SIC Code: 0723
County Location: Tipton
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source, under PSD;
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

- (a) One (1) soybean receiving pit (identified as 1E), constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using a cyclone as control and exhausting to stack 1A.
- (b) Two (2) cleaners (identified as 3E), constructed prior to 1978, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using a baghouse as control, and exhausting to stack 3A.
- (c) Eight (8) spirals, (identified as 4E), with a combined maximum sorting capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using hanging bags as control, and exhausting inside the building.
- (d) Three (3) gravity tables (identified as 5E, 6E and 7E), constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones as control, and exhausting to stack 5A, 6A and 7A.
- (e) One (1) aspirator (identified as 2E), constructed prior to 1978, with a maximum aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using a cyclone as control, and exhausting to stack 2A.
- (f) One (1) baghouse (identified as baghouse 8A), constructed September 20, 2000, venting otherwise fugitive emissions from storage bins, scales, conveyors, and bag filters located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

- (d) The notification 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, on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within thirty (30) days after issuance of this permit, including the following information on each emissions unit:
- (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

The PMP extension notification does not require the certification by an "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 PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an "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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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

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

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][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, EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted 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 this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ shall issue a revised permit.

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.

B.11 Annual Fee Payment [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.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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 forty percent (40%) 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 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.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.6 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

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 an "authorized individual" 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, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements

C.7 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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 Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the 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.8 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 IAC 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

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing 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.

C.11 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.12 Compliance Response Plan - Preparation and Implementation

- (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 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 timeframe 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, 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 a minor permit modification 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) 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.

Record Keeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) 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, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) soybean receiving pit (identified as 1E), constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using a cyclone as control and exhausting to stack 1A.
- (b) Two (2) cleaners (identified as 3E), constructed prior to 1978, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using a baghouse as control, and exhausting to stack 3A.
- (c) Eight (8) spirals, (identified as 4E), with a combined maximum sorting capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using handling bags as control, and exhausting inside the building.
- (d) Three (3) gravity tables (identified as 5E, 6E and 7E), constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones as control, and exhausting to stack 5A, 6A and 7A.
- (e) One (1) aspirator (identified as 2E), constructed prior to 1978, with a maximum aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using a cyclone as control, and exhausting to stack 2A.
- (f) One (1) baghouse (identified as baghouse 8A), constructed September 20, 2000, venting otherwise fugitive emissions from storage bins, scales, conveyors, and bag filters located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.

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

Emission Limitations and Standards

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The particulate matter emissions from the soybean processing plant shall not exceed the following pound per hour limitations:

Facility	PM Limit (lbs/hr)
Soybean receiving pit	0.32
Internal handling	0.18
Cleaners	0.23
Gravity tables	2.25
Spirals	0.23
Soybean packaging	0.42
Aspirator	0.90

Compliance with these limits makes 326 IAC 2-2 and 40 CFR 52.21 not applicable.

D.1.2 Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3, particulate emissions from the soybean receiving pit shall not exceed 50.23 pounds per hour when operating at a process weight of 90 tons per hour. The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight above sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3, particulate emissions from the soybean cleaners, spirals, gravity tables, packaging and aspirators shall not exceed the pound per hour limit provided in the table below.

Facility	Process Weight (tons/hr)	Particulate Emission Limit (lbs/hr)
Cleaners (2) (per cleaner)	15	25.16
Spirals (8) (per spiral)	3.75	9.94
Gravity Tables (3) (per gravity table)	10	19.18
Packaging	30	40.04
Aspirator	30	40.04

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Particulate Control

Pursuant to F159-11180-00010, issued January 25, 2000, and in order to comply with Conditions D.1.1 and D.1.2, the cyclone and baghouse for particulate control shall be in operation and control emissions from the soybean seed processing facilities at all times these facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(2)]

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the soybean seed processing facilities stack exhausts (1A, 2A, 3A, 5A, 6A and 7A) 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 and Implementation shall be considered a violation of this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the soybean seed processing facilities, at least once per shift when the soybean seed processing facilities are in operation, when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 6.5 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 - Preparation and Implementation. 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 and Implementation shall be considered a violation of this permit.

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

D.1.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the soybean seed processing facilities when venting to the atmosphere. 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.1.9 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the process when venting to the atmosphere. A cyclone 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.

D.1.10 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. 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 and Implementation 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.

D.1.11 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.12 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the soybean seed stack exhausts when venting to the atmosphere.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.8 and D.1.9 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Monsanto Global Seed Company
Address:	908 North Independence
City:	Windfall, Indiana 46076
Phone #:	765-945-7121
MSOP #:	159-15902-00010

I hereby certify that Monsanto Global Seed Company is still in operation.
 no longer in operation.

I hereby certify that Monsanto Global Seed Company is in compliance with the requirements of MSOP 159-15902-00010.
 not in compliance with the requirements of MSOP 159-15902-00010.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-5967

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____

(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

PAGE 1 OF 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

February 28, 2003

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Monsanto Global Seed Company
Source Location: 908 North Independence, Windfall, Indiana 46076
County: Tipton
SIC Code: 0723
Operation Permit No.: 159-15902-00010
Permit Reviewer: ERG/ SD

The Office of Air Quality (OAQ) has reviewed an application from Monsanto Global Seed Company relating to the operation of soybean seed processing plant.

History

- (a) Monsanto Global Seed Company was issued a Federally Enforceable State Operation Permit (permit no. 159-11180-00010) on January 25, 2000 for a soybean and corn processing plant. This permit limited the emissions of PM₁₀ from this source to less than 100 TPY.
- (b) On February 11, 2000 the source submitted an application to OAQ requesting IDEM, OAQ remove a condition pertaining to the submittal of an annual emission statement. The permit no. 159-11180-00010 was revised.
- (c) A letter requesting permission to construct an addition of a baghouse, identified as 8A, to control emissions from the existing facilities at the source and exhausting inside the building was received on August 2, 2000. The permit was administratively amended as reflected in permit no. 159-12576-00010.
- (d) On October 13, 2000 a letter requesting IDEM, OAQ remove the conditions related to the corn dryer (identified as 8E) and corn sheller (identified as 9A) and for condition C.13 (Emergency Reduction Plan) was received. The permit was administratively amended as reflected in permit no. # 159-12858-00010.
- (e) A letter requesting permission to install a new cartridge filter system was received on July 15, 2002. The permit was administratively amended as reflected in permit no. 159-11180-00010.
- (f) On July 18, 2002 the source requested a change in permit status from a FESOP to a MSOP since upon removal of all corn operations from the site (as given in permit no. 159-12858-00010), the potential to emit PM₁₀ was less than 100 tons per year. In addition, the

source requested the capacity of the receiving operations be revised to 180,000 pounds per hour because the 60,000 pounds per hour process rate, previously stated in their current permit, was incorrect.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) soybean receiving pit (identified as 1E), constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using a cyclone as control and exhausting to stack 1A.
- (b) Two (2) cleaners (identified as 3E), constructed prior to 1978, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using a baghouse as control, and exhausting to stack 3A.
- (c) Eight (8) spirals, (identified as 4E), with a combined maximum sorting capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse as control, and exhausting inside the building.
- (d) Three (3) gravity tables (identified as 5E, 6E and 7E), constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones as control, and exhausting to stack 5A, 6A and 7A.
- (e) One (1) aspirator (identified as 2E), constructed prior to 1978, with a maximum aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using a cyclone as control, and exhausting to stack 2A.
- (f) One (1) baghouse (identified as baghouse 8A), constructed September 20, 2000, venting otherwise fugitive emissions from storage bins, scales, conveyors, and bag filters located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.
- (g) One (1) corn dryer, identified as 8E, with a maximum drying capacity of sixteen thousand eight hundred (16,800) pounds of corn per hour, and exhausting to stack 8A. **Note: This process was removed from the plant in 2000.**
- (h) One (1) corn sheller, identified as 9A, with a maximum drying capacity of forty four thousand eight hundred (44,800) pounds of corn per hour. **Note: This process was removed from the plant in 2000.**

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new construction activities included in this permit.

Existing Approvals

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

- (a) F159-11180-00010, issued January 5, 2000.
- (b) First Significant Permit Revision 159-11180-00010, issued April 18, 2000.

- (c) First Administrative Amendment 159-12576-00010, issued September 20, 2000.
- (d) Second Administrative Amendment 159-12858-00010, issued December 11, 2000.
- (e) Reopening 159-13112-00010, issued October 1, 2001.
- (f) Third Administrative Amendment 159-11180-00010, issued September 3, 2002.

All conditions from previous approvals were incorporated into this permit except the following:

- (a) F159-11180-00010, issued on January 5, 2000.

Condition D.1.2 Particulate Matter (PM) [326 IAC 2-2, and 40 CFR 52.21]: Any change or modification which may increase the after control PM emissions to 250 tons per year or more for the entire source must be approved by the Office of Air Management (OAM) before any such change may occur.

Reason not incorporated: For clarification purposes, this condition has been reworded to include PSD emission limitations. As previously, the source will use PM control devices to ensure that the PM emissions never exceed 250 tons per year.

- (b) 159-11180-00010, issued April 18, 2000.
 Condition C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)].

Reason not incorporated: The source is located in Tipton county and the PTE any of the criteria pollutants is less than 100 tpy. Therefore, Section C.17 was removed.

- (c) 159-12858-00010, issued December 11, 2000.
 Condition C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Reason not incorporated: The source is located in Tipton county and OAM determined that the PTE for all regulated pollutants is less than 100 TPY. Therefore, Section C.13 was removed.

- (d) 159-12858-00010, issued December 11, 2000.
 Condition D.1.6 Visible Emissions Notations (Corn Dryer)

Reason not incorporated: The source removed the corn dryer and corn sheller. Therefore, Condition D.1.6 was removed.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
1A	Soybean Receiving Pit	27.42	1.1	3,500	Ambient
2A	Aspirator	23.0	1.5 x 3	8,000	Ambient
3A	Cleaners (2)	27.5	3.5 x 5	18,000	Ambient
5A	Gravity Table 1	29.67	1.7 x 3.7	15,000	Ambient
6A	Gravity Table 2	29.67	1.7 x 3.7	16,500	Ambient

7A	Gravity Table 3	29.67	1.7 x 3.7	15.200	Ambient
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Recommendation

The staff recommends to the Commissioner that the Minor Source Operating Permit 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.

A complete application for the purposes of this review was received on July 18, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 8).

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	323.25
PM-10	87.0
SO ₂	0
VOC	0
CO	0
NO _x	0

There are no significant emissions of Hazardous Air Pollutants (HAPs)

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Tipton County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (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. Tipton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Tipton County has been classified as attainment or unclassifiable for SO₂, NO₂, CO, PM₁₀, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls.

Process/facility	Potential to Emit (tons/year)						
	PM*	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Soybean Receiving Pit	1.38	3.07	0.00	0.00	0.00	0.00	0.00
Internal Handling	0.80	4.47	0.00	0.00	0.00	0.00	0.00
Cleaners	0.99	24.64	0.00	0.00	0.00	0.00	0.00
Gravity Tables	9.86	24.64	0.00	0.00	0.00	0.00	0.00
Spirals	0.99	24.64	0.00	0.00	0.00	0.00	0.00
Aspirator	3.94	3.94	0.00	0.00	0.00	0.00	0.00
Packaging	1.84	1.84	0.00	0.00	0.00	0.00	0.00
Total Emissions	19.82	87.0	0.00	0.00	0.00	0.00	0.00

* - PTE based on PSD emission limits for PM.

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on the revised potential to emit calculations provided in Appendix A.

Federal Rule Applicability

- (a) The soybean seed processing plant is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.300, Subpart DD), because the source was constructed before August 3, 1978 and has not been modified or reconstructed.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Tipton county and the potential to emit carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NO_x), particulate matter (PM₁₀), or sulfur dioxide (SO₂) into the ambient air is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

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), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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.

326 IAC 2-2 (Prevention of Significant Deterioration)

Monsanto's plant was constructed in the 1950's and is not in 1 of the 28 source categories. The source was modified in the early 1990's to add a soybean processing facility. After this modification, the PM and PM₁₀ PTE were greater than 250 tons per year. However, this was not identified during the preparation of the construction permit. On December 11, 2000 the source informed IDEM, OAQ of the removal of the corn dryer and corn sheller from the plant. After the

removal of these units, the source's PM PTE before controls remained above 250 tons per year. The source's current permit includes a condition that requires the actual PM emissions from the entire source to be less than 250 tons per year. The source uses, and has always used, control devices (including cyclones and baghouse), which have resulted in actual PM emissions that are much lower than the 250 tons per year PSD threshold. Because the actual PM and PM₁₀ emissions have always been less than 250 tons per year, a PSD permit for the past constructions are not necessary. However, a condition specifically limiting the source to less than 250 tons per year is necessary to make 326 IAC 2-2 and 40 CFR 52.21 not applicable.

The following condition has been added to the permit:

The particulate matter emissions from the soybean processing plant shall not exceed the following pound per hour limitations:

Facility	PM Limit (lbs/hr)
Soybean receiving pit	0.32
Internal handling	0.18
Cleaners	0.23
Gravity tables	2.25
Spirals	0.23
Soybean packaging	0.42
Aspirator	0.90

These emission limitations are equivalent to 19.82 tons of PM per twelve (12) consecutive month period. Therefore, compliance with these limits makes 326 IAC 2-2 and 40 CFR 52.21 not applicable.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the soybean operation plant shall not exceed the particulate emission limit in pounds per hour as shown in table below.

Facility	Process Weight		Particulate Emission Limit (lbs./hr)
	(tons/hr)	(lbs/hr)	
Soybean receiving pit	180,000	90	50.23
Cleaners (2)	30,000 per cleaner	15	25.16 per cleaner
Spirals (8)	7,500 per spiral	3.75	9.94 per spiral
Gravity Tables (3)	20,000 per gravity table	10	19.18 per gravity table
Packaging	60,000	30	40.04
Aspirator	60,000	30	40.04

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

The cyclone and baghouse shall be in operation at all times the soybean seed processing facilities are in operation, in order to comply with this limit.

Conclusion

The operation of this soybean seed processing plant shall be subject to the conditions of the attached Minor Source Operating Permit 159-15902-00010.

**Appendix A: Emission Calculations
Particulate from Soyabean Receiving Pit**

Company Name: Monsanto Company

Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076

CP: 159-15902

Plt ID: 159-00010

Reviewer: ERG/SD

Date: November 6, 2002

	Receiving Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Cyclone Control Efficiency	PTE After Controls (tons/yr)
PM	90	0.035	13.8	90%	1.38
PM₁₀	90	0.0078	3.07	90%	0.307

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving by Hopper Truck, SCC 3-02-005-52). May 1998

** Assume all PM emissions are PM₁₀.

Methodology

PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr

**Appendix A: Emission Calculations
Particulate from Internal Handling**

Company Name: Monsanto Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
CP: 159-15902
Plt ID: 159-00010
Reviewer: ERG/SD
Date: November 6, 2002

	Handling Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Cyclone Control Efficiency	PTE After Controls (tons/yr)
PM	30	0.061	8.02	90%	0.802
PM₁₀	30	0.034	4.47	90%	0.447

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). May 1998

** Assume all PM emissions are PM₁₀.

Methodology

PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr

**Appendix A: Emission Calculations
Particulate from Cleaners**

Company Name: Monsanto Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
CP: 159-15902
Plt ID: 159-00010
Reviewer: ERG/SD
Date: Nov 06, 2002

	Cleaning Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Baghouse Control Efficiency***	PTE After Controls (tons/yr)
PM	30	0.075	98.55	99%	0.99
PM₁₀	30	0.075	24.64	99%	0.02

* Emission factors from AP-42, Table 9.9.1-1 (Grain Cleaning, Internal Vibrating, SCC 3-02-005-37). May 1998

**Before controls, PM₁₀ is 25 % of the filterable PM. From AP-42, Table 9.9.1-1 (Grain Cleaning, SSC 3-02-005-37)

Also, before controls emission factors were calculated assuming 90 % capture efficiency

***Assume all PM emissions are PM₁₀.

Methodology

PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr

**Appendix A: Emission Calculations
Particulate from Gravity Tables**

Company Name: Monsanto Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
CP: 159-15902
Plt ID: 159-00010
Reviewer: ERG/SD
Date: November 6, 2002

	Sorting Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Cyclone Control Efficiency***	PTE After Controls (tons/yr)
PM	30	0.075	98.55	90%	9.86
PM₁₀	30	0.075	24.64	90%	0.23

* Emission factors from AP-42, Table 9.9.1-1 (Grain Cleaning, Internal Vibrating SCC 3-02-005-037). May 1998

**Before controls, PM₁₀ is 25 % of the filterable PM. From AP-42, Table 9.9.1-1 (Grain Cleaning, SSC 3-02-005-37)

Also, before controls emission factors were calculated assuming 90 % capture efficiency

***Assume all PM emissions are PM₁₀.

Methodology

PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr

**Appendix A: Emission Calculations
Particulate from Spirals**

Company Name: Monsanto Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
CP: 159-15902
Plt ID: 159-00010
Reviewer: ERG/SD
Date: November 6, 2002

	Sorting Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Baghouse Control Efficiency*** (%)	PTE After Controls (tons/yr)
PM	30	0.075	98.55	99%	0.99
PM₁₀	30	0.075	24.64	99%	0.02

* Emission factors from AP-42, Table 9.9.1-1 (Grain Cleaning, Internal Vibrating SCC 3-02-005-37). May 1998

**Before controls, PM₁₀ is 25 % of the filterable PM. From AP-42, Table 9.9.1-1 (Grain Cleaning, SSC 3-02-005-37)

Also, before controls emission factors were calculated assuming 90 % capture efficiency

***Assume all PM emissions are PM₁₀.

Methodology

PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr

**Appendix A: Emission Calculations
Particulate from Packaging**

Company Name: Monsanto Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
CP: 159-15902
Plt ID: 159-00010
Reviewer: ERG/SD
Date: November 6, 2002

	Packaging Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)
PM	30	0.0014	1.84
PM₁₀	30	0.0014	1.84

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving by Hopper Truck, SCC 3-02-005-51). May 1998

**Before controls, emission factors were calculated assuming 90 % capture efficiency

Also, assume all PM emissions are PM₁₀.

Methodology

PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr

**Appendix A: Emission Calculations
Particulate from Aspirator**

Company Name: Monsanto Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
CP: 159-15902
Plt ID: 159-00010
Reviewer: ERG/SD
Date: November 6, 2002

	Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Cyclone Control*** Efficiency	PTE After Controls (tons/yr)
PM	30	0.003	3.94	90%	0.04
PM₁₀	30	0.003	3.94	90%	0.04

* Emission factors from AP-42, Table 9.9.1-1 (Rice Mills, Aspirator SCC 3-02-007-77). May 1998

**Before controls, emission factors were calculated assuming 90 % capture efficiency

*** Assume all PM emissions are PM₁₀.

Methodology

PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr

**Appendix A: Emission Calculations
Particulate from Aspirator**

Company Name: Monsanto Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
CP: 159-15902
Plt ID: 159-00010
Reviewer: ERG/SD
Date: November 6, 2002

SUMMARY EMISSIONS BEFORE CONTROL IN TPY

UNITS	PM	PM10
soyabean receiving pit	13.8	3.07
internal handling	8.02	4.47
cleaners	98.55	24.64
gravity tables	98.55	24.64
spirals	98.55	24.64
soyabean packaging	1.84	1.84
Aspirator	3.94	3.94
SUM	323.25	87

SUMMARY OF EMISSIONS AFTER CONTROL IN TPY

UNITS	PM	PM10
soyabean receiving pit	1.38	0.31
internal handling	0.80	0.45
cleaners	0.99	0.02
gravity tables	9.86	0.23
spirals	0.99	0.02
soyabean packaging	1.84	1.84
Aspirator	0.04	0.04
SUM	15.90	2.91