



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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TO: Interested Parties / Applicant
DATE: November 3, 2005
RE: Bunge North America / 001-16018-00005
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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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 considerations 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Bunge North America
1200 North 2nd Street
Decatur, Indiana 46733**

(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 2-7 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.

Operation Permit No.: T001-5610-00005	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 3, 2002 Expiration Date: July 3, 2007

First Administrative Amendment No.: T001-18591-00005, issued February 6, 2004;
Second Administrative Amendment No.: T001-21530-00005, issued September 23, 2005;

First Significant Permit Modification: T001-16018-00005	Pages Affected: Entire Permit
Issued by: Original signed by Paul Dubenetzky, Acting Assistant Commissioner Office of Air Quality	Issuance Date November 3, 2005: Expiration Date: July 3, 2007

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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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary grain handling, animal feed production, soybean meal production, and soybean oil extraction plant.

Responsible Official:	Plant Manager
Source Address:	1200 North 2 nd Street, Decatur, Indiana 46733
Mailing Address:	P.O. Box 1002, Decatur, Indiana 46733
General Source Phone Number:	(219)724-2101
SIC Code:	2075, 5153, 2048
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

NOTE: All throughputs and capacities are included in a IDEM, OAQ confidential file as the source considers them confidential.

- (a) Truck Dump #2, identified as 1EL1, constructed in 1980, using a baghouse for particulate matter (PM) control, and exhausting to stack 1EL;
- (b) The following grain elevator components, together identified as 2EL1, using a baghouse and oil suppressant for PM control, and exhausting to stack 2EL:
 - (1) One (1) dryer megatex enclosed conveyor, constructed in 1997;
 - (2) One (1) dryer rotex, constructed in 1978;
 - (3) One (1) screening bin hammermill, constructed in 1978;
 - (4) One (1) #1 scalperator, constructed prior to 1977;
 - (5) One (1) #2 scalperator, constructed prior to 1977;
 - (6) One (1) #3 scalperator, constructed prior to 1977;
 - (7) One (1) ext. screening bin, constructed prior to 1977;
 - (8) One (1) screening bin, constructed prior to 1977;
 - (9) One (1) solvent screening leg, constructed prior to 1977;
 - (10) One (1) #1 leg, constructed prior to 1977;

- (11) One (1) #2 leg, constructed prior to 1977;
 - (12) One (1) #3 leg, constructed prior to 1977;
 - (13) One (1) west to east Hi-Roller, constructed in 1992;
 - (14) One (1) west to east belt loader, constructed prior to 1977;
 - (15) One (1) dry bean leg, constructed prior to 1977;
 - (16) One (1) #1 dryer Hi-Roller, constructed in 1994;
 - (17) One (1) weaver's belt, constructed in 1994; and
 - (18) One (1) 102 belt, constructed in 1994;
- (c) The following grain elevator components, together identified as 5EL1, using a baghouse and oil suppressant for PM control, and exhausting to stack 5EL:
- (1) One (1) north tripper buggy, constructed in 1978;
 - (2) One (1) north galley belt loader, constructed in 1978;
 - (3) One (1) east west belt, constructed in 1995; and
 - (4) One (1) bin 102, constructed prior to 1977;
- (d) One (1) north west receiving house enclosed conveyor identified as 8EL1, constructed in 1995, using oil suppressant for PM control, with no aspiration;
- (e) The following grain elevator components, together identified as 10EL1, using a baghouse and oil suppressant for PM control, and exhausting to stack 10EL:
- (1) One (1) rail loadout, constructed in 1984;
 - (2) One (1) rail receiving, constructed in 1960;
 - (3) One (1) north leg, constructed prior to 1960; and
 - (4) One (1) south leg, constructed prior to 1960;
- (f) The following grain elevator components, together identified as 14EL1, using a baghouse and oil suppressant for PM control, and exhausting to stack 14EL:
- (1) One (1) jumbo silo east galley belt, constructed prior to 1977;
 - (2) One (1) jumbo silo west galley belt, constructed in 1993; and
 - (3) One (1) jumbo silo crossover galley belt, constructed prior to 1977;
- (g) One (1) natural gas fired grain dryer #2, identified as 19EL1, constructed in 1995, using self-cleaning screens for PM control, and exhausting to vent 19EL;
- (h) One (1) truck dump #7, identified as 20EL1, constructed in 1997, consisting of one (1) weight scale truck unloading pit, and two (2) enclosed bucket elevator legs, using two (2) baghouses in parallel for PM control, and exhausting to stack 20EL;

- (i) Silo bin vents, identified as 3EL, constructed prior to 1977, using soybean oil as a dust suppressant, and exhausting to vent 3EL;
- (j) Silo direct loadout, identified as 4EL1, constructed prior to 1977, using soybean oil as a dust suppressant;
- (k) One (1) south tripper buggy, one (1) south galley belt loader, and one (1) north south belt, identified as 6EL1, all constructed prior to 1977, using a baghouse and oil suppressant for PM control, and exhausting to stack 6EL;
- (l) One (1) south west receiving house enclosed conveyor, identified as 7EL1, constructed in 1995, using oil suppressant for PM control with no aspiration;
- (m) One (1) truck dump #3, identified as 9EL1, constructed in 1976, using a baghouse for PM control, and exhausting to stack 9EL;
- (n) One (1) truck dump #5, identified as 12EL1, constructed prior to 1977, using a baghouse for PM control, and exhausting to stack 12EL;
- (o) One (1) jumbo silo east tunnel belt, one (1) jumbo silo west tunnel belt, and one (1) jumbo silo crossover tunnel belt, identified as 13EL1, all constructed prior to 1977, using a baghouse and oil suppressant for PM control, and exhausting to stack 13EL;
- (p) One (1) truck dump #6, identified as 15EL1, constructed prior to 1977, using a baghouse for PM control, and exhausting to stack 15EL;
- (q) Two (2) natural gas fired grain dryers, #4 and #5, identified as 17EL1, constructed in the 1960's, using self-cleaning screens for PM control, and exhausting to vent 17EL;
- (r) One (1) Lec. Dept. filter aid unit, identified as 204RO1, constructed in 1980, with a maximum capacity of 2.5 tons of diatomaceous earth per hour, using a baghouse for PM control, and exhausting to stack 204RO;
- (s) Daily use bins, identified as 102EO1, constructed in 1976, using a baghouse for PM control, and exhausting to stack 102EO;
- (t) Filter aid silos, identified as 103EO1, constructed in 1976, using a baghouse for PM control, and exhausting to stack 103EO;
- (u) One (1) natural gas fired hydrogen generator furnace, identified as 107EO1, constructed in 1992, and exhausting to stack 107EO;
- (v) Salt conveying, identified as 4SP1, constructed in 1981, using a baghouse for PM control, and exhausting to stack 4SP;
- (w) Six (6) flaking rolls, #1, #2, #3, #4, #5, and #6, constructed in 1996, and B flake n/s drag, constructed in 1991, all identified together as 1EX1, sharing fabric filters with 1EX2 for PM control, and exhausting to stack 1EX;
- (x) One (1) flaking roll #14 and flaking roll discharge #14, identified as 1EX2, constructed in 1991, sharing fabric filters with 1EX1 for PM control, and exhausting to stack 1EX;
- (y) One (1) 'A' conditioner, identified as 2EX1, constructed in the 1930's, with no PM control, and exhausting to stack 2EX;
- (z) The following soybean processing equipment, together identified as 3EX1, sharing a cyclone with 3EX2 for PM control, and exhausting to stack 3EX:

- (1) Four (4) flaking rolls, #9, #10, #11, and #12, constructed in 1978;
 - (2) One (1) flaking roll #13, constructed in 1985;
 - (3) One (1) 'A' flake n/s drag, constructed in 1993; and
 - (4) One (1) 'A' flake e/w drag, constructed in 1993;
- (aa) One (1) north run around drag, identified as 3EX2, constructed in 1984, sharing a cyclone with 3EX1, and exhausting to stack 3EX;
- (bb) The following soybean processing equipment, together identified as 4EX1, sharing a baghouse with 4EX2 and 4EX3 for PM control, and exhausting to stack 4EX:
- (1) One (1) whole bean scale, constructed in 1989;
 - (2) One (1) 'A' whole bean leg, constructed in 1997;
 - (3) One (1) 'A' surge bin, constructed prior to 1979;
 - (4) One (1) whole bean drag, constructed in 1981; and
 - (5) One (1) 'B' surge bin, constructed prior to 1979;
- (cc) A run around rework screw, identified as 4EX2, constructed in 1991, sharing a baghouse with 4EX1 and 4EX3 for PM control, and exhausting to stack 4EX;
- (dd) The following soybean processing equipment, together identified as 4EX3, sharing a baghouse with 4EX1 and 4EX2 for PM control, and exhausting to stack 4EX:
- (1) One (1) hull refining screw conveyor, constructed in 1991;
 - (2) One (1) hull refining process, constructed in 1991; and
 - (3) One (1) hull grinding process, constructed in 1987;
- (ee) Dehulling equipment, identified as 5EX1, constructed in 1997, sharing a baghouse with 5EX2 and 5EX3 for PM control, and exhausting to stack 5EX;
- (ff) Hot dehulling equipment, identified as 5EX2, constructed in 1991, sharing a baghouse with 5EX1 and 5EX3 for PM control, and exhausting to stack 5EX;
- (gg) Screening aspiration, identified as 5EX3, constructed in 1988, sharing a baghouse with 5EX1 and 5EX2 for PM control, and exhausting to stack 5EX;
- (hh) Truck loadout, identified as 6EX1, constructed in 1982, replaced in 1999, using a baghouse for PM control, and exhausting to stack 6EX;
- (ii) The following soybean processing equipment, together identified as 7EX1, using a baghouse for PM control, and exhausting to stack 7EX:
- (1) One (1) north megamill, constructed in 1993;
 - (2) One (1) south megamill, constructed in 1993; and
 - (3) One (1) stedman grinder, constructed in 1983;

- (jj) One (1) leg No. 2, one (1) mixing conveyor, and one (1) bin drag, together identified as 9EX1, all constructed in 1983, using a baghouse for PM control, and exhausting to stack 9EX;
- (kk) The following soybean processing equipment, together identified as 10EX1, using a baghouse for PM control, and exhausting to stack 10EX:
 - (1) One (1) leg No. 3, constructed in the 1950's;
 - (2) One (1) tunnel drag, constructed in 1983; and
 - (3) One (1) meal loadout drag, constructed in 1982;
- (ll) One (1) kaolin bin, identified as 11EX1, constructed in the 1950's, using a baghouse for PM control, and exhausting to stack 11EX;
- (mm) One (1) meal loadout bin, identified as 12EX1, constructed in 1982, using a baghouse for PM control, and exhausting to stack 12EX;
- (nn) One (1) pre-DT section on top of 'A' top dryer section, constructed in 1996, and exhausting to 'A' top dryer section for PM control and one (1) 'A' top dryer section, identified as 13EX1, constructed in 1980, using a cyclone for PM control, exhausting to stack 13EX, with hexane emissions reported in 24EX;
- (oo) One (1) 'A' middle dryer section, identified as 13EX2, constructed in 1980, using a cyclone for PM control, exhausting to stack 13EX, with hexane emissions reported in 24EX;
- (pp) One (1) 'A' bottom cooler section, identified as 13EX3, constructed in 1980, using a cyclone for PM control, exhausting to stack 13EX, with hexane emissions reported in 24EX;
- (qq) One (1) pre-DT section on top of 'B' top dryer section, constructed in 1996, and exhausting to 'B' top dryer section for PM control, and one (1) 'B' top dryer section, identified as 14EX1, constructed in 1980, using a cyclone for PM control, exhausting to stack 14EX, with hexane emissions reported in 24EX;
- (rr) One (1) 'B' middle dryer section, identified as 14EX2, constructed in 1980, using a cyclone for PM control, exhausting to stack 14EX, with hexane emissions reported in 24EX;
- (ss) One (1) 'B' bottom cooler section, identified as 14EX3, constructed in 1980, using a cyclone for PM control, exhausting to stack 14EX, with hexane emissions reported in 24EX;
- (tt) One (1) meal cooler, identified as 21EX, constructed in 1996, using two (2) cyclones for PM control and exhausting to stacks 21EX-A and 21EX-B, with hexane emissions reported in 24EX;
- (uu) One (1) belt to storage bowls, one (1) large storage bowl, and one (1) small storage bowl, identified as 16EX1, 16EX2, and 16EX3, respectively, all constructed in 1982, with no PM control, and exhausting to stack 16EX;
- (vv) Whole bean bins, identified as 18EX1, constructed in the 1940's, with no PM control, and exhausting to stack 18EX;

- (ww) Meal storage silos with bin vents, identified as 23EX1, constructed in the 1950's, and one (1) bin vent filter, exhausting to stack 23EX;
- (xx) One (1) zinc receiving bin, identified as 25EX1, constructed in 1994, sharing a bin vent filter with 25EX2 for PM control, and exhausting to stack 25EX;
- (yy) One (1) zinc surge bin, identified as 25EX2, constructed in 1994, sharing a bin vent filter with 25EX1 for PM control, and exhausting to stack 25EX;
- (zz) One (1) rumen conveyor, identified as 8EX1, constructed in 1994, using a cyclone for PM control, and exhausting to stack 8EX;
- (aaa) One (1) rotary reactor, identified as 27EX1, constructed in the 1994, using a cyclone for PM control, and exhausting to stack 27EX;
- (bbb) Rumen loadout bins, identified as 29EX1, constructed in 1994, using a bin vent filter for PM control, and exhausting to stack 29EX;
- (ccc) Rumen rework surge bin, identified as 30EX1, constructed in 1994, using a polyethylene fabric filter for PM control, and exhausting to stack 30EX;
- (ddd) One (1) natural gas fired heater, identified as 110EO, constructed in 2002, and exhausting to stack 110EO;
- (eee) One (1) natural gas fired steam generator #3, identified as 108EO1, constructed in 1994, and exhausting to stack 108EO;
- (fff) One (1) B & W coal fired boiler, identified as 1SP1, constructed in 1950, using multiple cyclones for PM control, and exhausting to stack 1SP;
- (ggg) One (1) Keeler coal fired boiler, identified as 2SP1, constructed in 1963, using multiple cyclones for PM control, and exhausting to stack 1SP
- (hhh) One (1) Murray natural gas fired, vegetable oil-fired, waste oil-fired, and hazardous chemical fired boiler, identified as 3SP1, constructed in 1968, and exhausting to stack 1SP;
- (iii) Hexane extraction system, identified as 24EX1, modified prior to 1980, with hexane emissions from the vent system controlled by a mineral oil absorber, and exhausting to stack 24EX1 (for reporting purposes, all other hexane emissions are collectively accounted for in the total hexane losses named 24EX);
- (jjj) One (1) pre DT section on top of 'A' top dryer section, constructed in 1996, and one (1) 'A' DTDC top dryer section, constructed prior to 1980, with hexane emissions controlled by a mineral oil absorber and reported in 24EX;
- (kkk) One (1) 'A' DTDC middle dryer section, identified as 24EX3, constructed prior to 1980, with hexane emissions controlled by a mineral oil absorber, and reported in 24EX;
- (lll) One (1) 'A' DTDC bottom cooler section, identified as 24EX4, constructed prior to 1980, with hexane emissions controlled by a mineral oil absorber, and reported in 24EX;
- (mmm) One (1) pre-DT section on top of 'B' top dryer section, constructed in 1996, and one (1) 'B' DTDC top dryer section, constructed prior to 1980, both identified as 24EX5, with hexane emissions controlled by a mineral oil absorber, and reported in 24EX;

- (nnn) One (1) 'B' DTDC middle dryer section, identified as 24EX6, constructed prior to 1980, with hexane emissions controlled by a mineral oil absorber, and reported in 24EX;
- (ooo) One (1) 'B' DTDC bottom cooler section, identified as 24EX7, constructed prior to 1980, with hexane emissions controlled by a mineral oil absorber, and reported in 24EX;
- (ppp) One (1) meal cooler, identified as 21EX, constructed in 1996, with hexane emissions controlled by a mineral oil absorber, and reported in 24EX;
- (qqq) Two (2) hexane storage tanks, identified as 24EX8a and 24EXb, constructed in 1995 and 2005, respectively, and vented to the mineral oil absorber inlet;
- (rrr) Wastewater system containing hexane, identified as 24EX9, constructed prior to 1980, and exhausting at the plant treatment facility;
- (sss) One (1) refined oil hot well, identified as 24EX10, constructed in 1975;
- (ttt) One (1) sampling/hexane unloading port, identified as 24EX11, and with no control;
- (uuu) One (1) natural gas fired grain dryer #1, identified as 16EL, constructed in 1986, using self-cleaning screens for PM control, and exhausting to stack 16EL;
- (vvv) The following soybean processing equipment, identified as 17EX2, modified in 1987, using a cyclone for PM control, and exhausting to stack 17EX:
 - (1) One (1) flaking roll #8, constructed in 1981; and
 - (2) One (1) 'B' flake e/w drag, constructed in 1980.
- (www) Two (2) conditioners identified as 31EX1 and 31EX2 constructed in 2002, and exhausting internally.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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.2 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 original date, 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.3 Enforceability [326 IAC 2-7-7]

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, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (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
Indianapolis, Indiana 46204

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, 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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. 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.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(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; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) 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.
- (d) 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.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 a responsible official 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) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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 July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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, 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 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[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 ninety (90) days after issuance of this permit, 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
Indianapolis, Indiana 46204

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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, 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 PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (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.12 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe 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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (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
Indianapolis, Indiana 46204

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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, 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 2-7 and any other applicable rules.
- (g) 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.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits 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) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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 do 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.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, 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 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, 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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. 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 "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (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, on or before the date it is due.
- (2) If IDEM, OAQ, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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 2-7 until IDEM, OAQ, 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, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Indianapolis, Indiana 46204
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 preconstruction approval required by 326 IAC 2-7-10.5 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
Indianapolis, Indiana 46204

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 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades [326 IAC 2-7-20(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 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1]

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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
Indianapolis, Indiana 46204

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [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) Except as provided in 326 IAC 2-7-19(e), 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 317-233-4230 (ask for OAQ, Billing, Licensing and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

Pursuant to 326 IAC 6-3-2(c), 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.

C.2 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.3 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or 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.7 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. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

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 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).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204

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 14-10-4, 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 [326 IAC 2-7-6(1)]

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 Data Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 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. 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 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.13 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 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) Whenever a condition in this permit requires the measurement of a flow rate, the instrument 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.
- (c) 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.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [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).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 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 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) 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 2-7-16 (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.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual 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, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible 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 within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Data Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204
- (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, 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.

Stratospheric Ozone Protection

C.21 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 2-7-5(15)]:

- (a) Truck Dump #2, identified as 1EL1, constructed in 1980, using a baghouse for particulate matter (PM) control, and exhausting to stack 1EL;
- (b) The following grain elevator components, together identified as 2EL1, using a baghouse and oil suppressant for PM control, and exhausting to stack 2EL:
 - (1) One (1) dryer megatex enclosed conveyor, constructed in 1997;
 - (2) One (1) dryer rotex, constructed in 1978;
 - (3) One (1) screening bin hammermill, constructed in 1978;
 - (4) One (1) #1 scalperator, constructed prior to 1977;
 - (5) One (1) #2 scalperator, constructed prior to 1977;
 - (6) One (1) #3 scalperator, constructed prior to 1977;
 - (7) One (1) ext. screening bin, constructed prior to 1977;
 - (8) One (1) screening bin, constructed prior to 1977;
 - (9) One (1) solvent screening leg, constructed prior to 1977;
 - (10) One (1) #1 leg, constructed prior to 1977;
 - (11) One (1) #2 leg, constructed prior to 1977;
 - (12) One (1) #3 leg, constructed prior to 1977;
 - (13) One (1) west to east Hi-Roller, constructed in 1992;
 - (14) One (1) west to east belt loader, constructed prior to 1977;
 - (15) One (1) dry bean leg, constructed prior to 1977;
 - (16) One (1) #1 dryer Hi-Roller, constructed in 1994;
 - (17) One (1) weaver's belt, constructed in 1994; and
 - (18) One (1) 102 belt, constructed in 1994;
- (c) The following grain elevator components, together identified as 5EL1, using a baghouse and oil suppressant for PM control, and exhausting to stack 5EL:
 - (1) One (1) north tripper buggy, constructed in 1978;
 - (2) One (1) north galley belt loader, constructed in 1978;
 - (3) One (1) east west belt, constructed in 1995; and
 - (4) One (1) bin 102, constructed prior to 1977;

SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)

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

- (d) One (1) north west receiving house enclosed conveyor identified as 8EL1, constructed in 1995, using oil suppressant for PM control, with no aspiration;
- (e) The following grain elevator components, together identified as 10EL1, using a baghouse and oil suppressant for PM control, and exhausting to stack 10EL:
 - (1) One (1) rail loadout, constructed in 1984;
 - (2) One (1) rail receiving, constructed in 1960;
 - (3) One (1) north leg, constructed prior to 1960; and
 - (4) One (1) south leg, constructed prior to 1960;
- (f) The following grain elevator components, together identified as 14EL1, using a baghouse and oil suppressant for PM control, and exhausting to stack 14EL:
 - (1) One (1) jumbo silo east galley belt, constructed prior to 1977;
 - (2) One (1) jumbo silo west galley belt, constructed in 1993; and
 - (3) One (1) jumbo silo crossover galley belt, constructed prior to 1977;
- (g) One (1) natural gas fired grain dryer #2, identified as 19EL1, constructed in 1995, using self-cleaning screens for PM control, and exhausting to vent 19EL;
- (h) One (1) truck dump #7, identified as 20EL1, constructed in 1997, consisting of one (1) weigh scale truck unloading pit, and two (2) enclosed bucket elevator legs, using two (2) baghouses in parallel for PM control, and exhausting to stack 20EL.

(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 2-7-5(1)]

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the affected facilities described in this section except when otherwise specified in 40 CFR Part 60, Subpart DD.

D.1.2 New Source Performance Standards (NSPS) Grain Elevators [326 IAC 12] [40 CFR Subpart DD 60.302]

Pursuant to 40 CFR Part 60, Subpart DD 60.302(b), process emission gases discharged into the atmosphere from the following units:

- (a) Unit 1EL1: Truck Dump #2;
- (b) Unit 10EL1: Rail loadout; and
- (c) Unit 20EL1: Truck Dump #7.

shall not exceed particulate matter (PM) concentrations of 0.01 gr/dscf. Process emission gases from these facilities shall not exhibit greater than 0 percent opacity.

D.1.3 PSD Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP001-4673-00005, issued May 10, 1996, the amount of soybean grains processed after the grain dryers shall be limited to less than 1,368,750 tons per twelve (12) consecutive month period. This limit, in combination with the limits in Conditions D.2.2 and D.5.3, restricts the net increases of PM and PM10 emissions for the modification in 1996 to below the PSD significant levels of twenty-five (25) and fifteen (15) tons per year, respectively, and also satisfies the requirements of 326 IAC 6-3-2 (Process Operations). This limit is equivalent to the following hourly limits for unit 19EL: less than 1.36 pounds per hour of PM; and less than 0.283 pounds per hour of PM10. This will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the following units shall be limited by the equation following this table:

Unit	Description
2EL1	Dryer Rotex Feed Drag, Dryer Rotex, Screening Bin Hammermill, #1, #2, and #3 Scalperators, Solvent Screening Leg, #1, #2, and #2 Leg, West to East Belt Head Section, West to East Belt Loader, Dry Bean Leg, #1 Dryer Hi-Roller, Weaver's Belt, 102 Belt
5EL1	North Tripper Buggy, West Workhouse Turnhead, North Galley Belt Loader, East West Belt, West Workhouse to East Workhouse Belt Loader
8EL1	North West Receiving House Tunnel Belt
14EL1	Jumbo Silo East Galley Belt, Jumbo Silo West Galley Belt, Jumbo Silo Crossover Galley Belt
19EL1	Grain Dryer #2

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 individual limitations are included in a IDEM, OAQ confidential file because the process weight rates are considered confidential by the source.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.6 Particulate Matter (PM)

- (a) In order to comply with Conditions D.1.2, D.1.3, and D.1.4, the baghouses for PM control shall be in operation and control emissions from 1EL1, 2EL1, 5EL1, 10EL1, 14EL1, and 20EL1 at all times that the processes are in operation.
- (b) In order to comply with Conditions D.1.2, D.1.3, and D.1.4, the self-cleaning screens for PM control shall be in operation and control emissions from 19EL1 at all times that the process is in operation.
- (c) In order to comply with Conditions D.1.2, D.1.3, and D.1.4, dust control oil shall be applied at all times that 2EL1, 5EL1, 1EL1, 10EL1, and 14EL1 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Visible Emissions Notations

- (a) Once per day visible emission notations of Unit 1EL1, 2EL1, 5EL1, 10EL1, 14EL1, 19EL1 vent and 20EL1 stack exhaust shall be performed 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 these processes 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 deviation from this permit.

D.1.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with 1EL1, 2EL1, 5EL1, 10EL1, 14EL1 and 20EL1 at least once per day when the processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the normal range of 0.5 to 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 - Preparation, Implementation, Records, and Reports. 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 deviation from 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 or at a frequency recommended by the manufacturer.

D.1.9 Baghouse and Self-Cleaning Screen Inspections

An inspection shall be performed once per year of all bags and self-cleaning screens controlling the facilities when venting to the atmosphere. Inspections are optional when venting to the indoors. All defective bags and screens shall be replaced.

D.1.10 Broken or Failed Bag or Screen 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 deviation from this permit.
- (b) For single compartment baghouses, 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).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records of the amount of soybean grains processed after the grain dryers. This is the same record that is required in Conditions D.2.11(a) and D.5.12(a).
- (b) To document compliance with Condition D.1.7(a), the Permittee shall maintain records of once per day visible emission notations of the stack exhaust from units 1EL1, 2EL1, 5EL1, 10EL1, 14EL1, 20EL1 and vent exhaust from unit 19EL1.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain once per day records of the total pressure drop across the baghouse during normal operation when venting to the atmosphere.
- (d) To document compliance with Condition D.1.9, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9 and the dates the vents are redirected.
- (e) To document compliance with Condition D.1.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address 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 "responsible official" as defined by 326 IAC 2-7-1(34). This is the same report as required in Condition D.2.11 and D.5.12.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (i) Silo bin vents, identified as 3EL, constructed prior to 1977, using soybean oil as a dust suppressant, and exhausting to vent 3EL;
- (j) Silo direct loadout, identified as 4EL1, constructed prior to 1977, using soybean oil as a dust suppressant;
- (k) One (1) south tripper buggy, one (1) south galley belt loader, and one (1) north south belt, identified as 6EL1, all constructed prior to 1977, using a baghouse and oil suppressant for PM control, and exhausting to stack 6EL;
- (l) One (1) south west receiving house enclosed conveyor, identified as 7EL1, constructed in 1995, using oil suppressant for PM control with no aspiration;
- (m) One (1) truck dump #3, identified as 9EL1, constructed in 1976, using a baghouse for PM control, and exhausting to stack 9EL;
- (n) One (1) truck dump #5, identified as 12EL1, constructed prior to 1977, using a baghouse for PM control, and exhausting to stack 12EL;
- (o) One (1) jumbo silo east tunnel belt, one (1) jumbo silo west tunnel belt, and one (1) jumbo silo crossover tunnel belt, identified as 13EL1, all constructed prior to 1977, using a baghouse and oil suppressant for PM control, and exhausting to stack 13EL;
- (p) One (1) truck dump #6, identified as 15EL1, constructed prior to 1977, using a baghouse for PM control, and exhausting to stack 15EL;
- (q) Two (2) natural gas fired grain dryers, #4 and #5, identified as 17EL1, constructed in the 1960's, using self-cleaning screens for PM control, and exhausting to vent 17EL;
- (r) One (1) Lec. Dept. filter aid unit, identified as 204RO1, constructed in 1980, with a maximum capacity of 2.5 tons of diatomaceous earth per hour, using a baghouse for PM control, and exhausting to stack 204RO;
- (s) Daily use bins, identified as 102EO1, constructed in 1976, using a baghouse for PM control, and exhausting to stack 102EO;
- (t) Filter aid silos, identified as 103EO1, constructed in 1976, using a baghouse for PM control, and exhausting to stack 103EO;
- (u) One (1) natural gas fired hydrogen generator furnace, identified as 107EO1, constructed in 1992, and exhausting to stack 107EO;
- (v) Salt conveying, identified as 4SP1, constructed in 1981, using a baghouse for PM control, and exhausting to stack 4SP;
- (w) Six (6) flaking rolls, #1, #2, #3, #4, #5, and #6, constructed in 1996, and B flake n/s drag, constructed in 1991, all identified together as 1EX1, sharing fabric filters with 1EX2 for PM control, and exhausting to stack 1EX;
- (x) One (1) flaking roll #14 and flaking roll discharge #14, identified as 1EX2, constructed in 1991, sharing fabric filters with 1EX1 for PM control, and exhausting to stack 1EX;
- (y) One (1) 'A' conditioner, identified as 2EX1, constructed in the 1930's, with no PM control, and exhausting to stack 2EX;

SECTION D.2 FACILITY OPERATION CONDITIONS (Continued)

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

- (z) The following soybean processing equipment, together identified as 3EX1, sharing a cyclone with 3EX2 for PM control, and exhausting to stack 3EX:
 - (1) Four (4) flaking rolls, #9, #10, #11, and #12, constructed in 1978;
 - (2) One (1) flaking roll #13, constructed in 1985;
 - (3) One (1) 'A' flake n/s drag, constructed in 1993; and
 - (4) One (1) 'A' flake e/w drag, constructed in 1993;
- (aa) One (1) north run around drag, identified as 3EX2, constructed in 1984, sharing a cyclone with 3EX1, and exhausting to stack 3EX;
- (bb) The following soybean processing equipment, together identified as 4EX1, sharing a baghouse with 4EX2 and 4EX3 for PM control, and exhausting to stack 4EX:
 - (1) One (1) whole bean scale, constructed in 1989;
 - (2) One (1) 'A' whole bean leg, constructed in 1997;
 - (3) One (1) 'A' surge bin, constructed prior to 1979;
 - (4) One (1) whole bean drag, constructed in 1981; and
 - (5) One (1) 'B' surge bin, constructed prior to 1979;
- (cc) A run around rework screw, identified as 4EX2, constructed in 1991, sharing a baghouse with 4EX1 and 4EX3 for PM control, and exhausting to stack 4EX;
- (dd) The following soybean processing equipment, together identified as 4EX3, sharing a baghouse with 4EX1 and 4EX2 for PM control, and exhausting to stack 4EX:
 - (1) One (1) hull refining screw conveyor, constructed in 1991;
 - (2) One (1) hull refining process, constructed in 1991; and
 - (3) One (1) hull grinding process, constructed in 1987;
- (ee) Dehulling equipment, identified as 5EX1, constructed in 1997, sharing a baghouse with 5EX2 and 5EX3 for PM control, and exhausting to stack 5EX;
- (ff) Hot dehulling equipment, identified as 5EX2, constructed in 1991, sharing a baghouse with 5EX1 and 5EX3 for PM control, and exhausting to stack 5EX;
- (gg) Screening aspiration, identified as 5EX3, constructed in 1988, sharing a baghouse with 5EX1 and 5EX2 for PM control, and exhausting to stack 5EX;
- (hh) Truck loadout, identified as 6EX1, constructed in 1982, replaced in 1999, using a baghouse for PM control, and exhausting to stack 6EX;

SECTION D.2 FACILITY OPERATION CONDITIONS (Continued)

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

- (ii) The following soybean processing equipment, together identified as 7EX1, using a baghouse for PM control, and exhausting to stack 7EX:
 - (1) One (1) north megamill, constructed in 1993;
 - (2) One (1) south megamill, constructed in 1993; and
 - (3) One (1) stedman grinder, constructed in 1983;
- (jj) One (1) leg No. 2, one (1) mixing conveyor, and one (1) bin drag, together identified as 9EX1, all constructed in 1983, using a baghouse for PM control, and exhausting to stack 9EX;
- (kk) The following soybean processing equipment, together identified as 10EX1, using a baghouse for PM control, and exhausting to stack 10EX:
 - (1) One (1) leg No. 3, constructed in the 1950's;
 - (2) One (1) tunnel drag, constructed in 1983; and
 - (3) One (1) meal loadout drag, constructed in 1982;
- (ll) One (1) kaolin bin, identified as 11EX1, constructed in the 1950's, using a baghouse for PM control, and exhausting to stack 11EX;
- (mm) One (1) meal loadout bin, identified as 12EX1, constructed in 1982, using a baghouse for PM control, and exhausting to stack 12EX;
- (nn) One (1) pre-DT section on top of 'A' top dryer section, constructed in 1996, and exhausting to 'A' top dryer section for PM control and one (1) 'A' top dryer section, identified as 13EX1, constructed in 1980, using a cyclone for PM control, exhausting to stack 13EX, with hexane emissions reported in 24EX;
- (oo) One (1) 'A' middle dryer section, identified as 13EX2, constructed in 1980, using a cyclone for PM control, exhausting to stack 13EX, with hexane emissions reported in 24EX;
- (pp) One (1) 'A' bottom cooler section, identified as 13EX3, constructed in 1980, using a cyclone for PM control, exhausting to stack 13EX, with hexane emissions reported in 24EX;
- (qq) One (1) pre-DT section on top of 'B' top dryer section, constructed in 1996, and exhausting to 'B' top dryer section for PM control, and one (1) 'B' top dryer section, identified as 14EX1, constructed in 1980, using a cyclone for PM control, exhausting to stack 14EX, with hexane emissions reported in 24EX;
- (rr) One (1) 'B' middle dryer section, identified as 14EX2, constructed in 1980, using a cyclone for PM control, exhausting to stack 14EX, with hexane emissions reported in 24EX;
- (ss) One (1) 'B' bottom cooler section, identified as 14EX3, constructed in 1980, using a cyclone for PM control, exhausting to stack 14EX, with hexane emissions reported in 24EX;
- (tt) One (1) meal cooler, identified as 21EX, constructed in 1996, using two (2) cyclones for PM control and exhausting to stacks 21EX-A and 21EX-B, with hexane emissions reported in 24EX;

SECTION D.2 FACILITY OPERATION CONDITIONS (Continued)

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

- (uu) One (1) belt to storage bowls, one (1) large storage bowl, and one (1) small storage bowl, identified as 16EX1, 16EX2, and 16EX3, respectively, all constructed in 1982, with no PM control, and exhausting to stack 16EX;
- (vv) Whole bean bins, identified as 18EX1, constructed in the 1940's, with no PM control, and exhausting to stack 18EX;
- (ww) Meal storage silos with bin vents, identified as 23EX1, constructed in the 1950's, and one (1) bin vent filter, exhausting to stack 23EX;
- (xx) One (1) zinc receiving bin, identified as 25EX1, constructed in 1994, sharing a bin vent filter with 25EX2 for PM control, and exhausting to stack 25EX;
- (yy) One (1) zinc surge bin, identified as 25EX2, constructed in 1994, sharing a bin vent filter with 25EX1 for PM control, and exhausting to stack 25EX;
- (zz) One (1) rumen conveyor, identified as 8EX1, constructed in 1994, using a cyclone for PM control, and exhausting to stack 8EX;
- (aaa) One (1) rotary reactor, identified as 27EX1, constructed in the 1994, using a cyclone for PM control, and exhausting to stack 27EX;
- (bbb) Rumen loadout bins, identified as 29EX1, constructed in 1994, using a bin vent filter for PM control, and exhausting to stack 29EX;
- (ccc) Rumen rework surge bin, identified as 30EX1, constructed in 1994, using a polyethylene fabric filter for PM control, and exhausting to stack 30EX;

(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 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the following units shall not exceed the pound per hour emission rate calculated using the equation following this table:

Unit	Description
3EL	Silo Bin Vents
4EL1	Silo Direct Loadout
6EL1	South Tripper Buggy, South Galley Belt Loader, North South Belt
7EL1	South West Receiving House Tunnel Belt
9EL1	Truck Dump #3
12EL1	Truck Dump #5
13EL1	Jumbo Silo East Tunnel Belt, Jumbo Silo West Tunnel Belt, Jumbo Silo Crossover Tunnel Belt
15EL1	Truck Dump #6
16EL1	Grain Dryer #1
17EL1	Grain Dryer #4 and #5
204RO1	Lec. Dept. Filter Aid Unit
102EO1	Daily Use Bins

Unit	Description
103EO1	Filter Aid Silos
4SP1	Salt Conveying
1EX1	Flaking Roll #1, #2, #3, #4, #5, #6, B Flake N/S Drag
1EX2	Flaking Roll #14, Flaking Roll Discharge #14
2EX1	'A' Conditioner
3EX1	Flaking Roll #9, #10, #11, #12, #13, 'A' Flake N/S Drag, 'A' Flake E/W Drag
3EX2	North Run Around Drag
4EX1	Whole Bean Scale, 'A' Whole Bean Leg, 'A' Surge Bin, Whole Bean Drag, 'B' Surge Bin
4EX2	Run Around Rework Screw
4EX3	Hull Refining Screw Conveyor, Hull Refining Process, Hull Grinding Process
5EX1	Dehulling Equipment
5EX2	Hot Dehulling Equipment
5EX3	Screening
6EX1	Truck Loadout
7EX1	North Megamill, South Megamill, Stedman Grinder
9EX1	Leg No. 2, Mixing Conveyor, Bin Drag
10EX1	Leg No.3, tunnel drag, meal loadout drag
11EX1	Kaolin Bin
12EX1	Meal Loadout Bin
13EX1	Pre-DT and 'A' Top Dryer Section
13EX2	'A' Middle Dryer Section
13EX3	'A' Bottom Cooler Section
14EX1	Pre-DT and 'B' Top Dryer Section
14EX2	'B' Middle Dryer Section
14EX3	'B' Bottom Cooler Section
16EX1	Belt to Storage Bowls
16EX2	Large Storage Bowl
16EX3	Small Storage Bowl
18EX1	Whole Bean Bins
21EX1	A and B Cooler
23EX1	Meal Storage Silos
25EX1	Zinc Receiving Bin
25EX2	Zinc Surge Bin
27EX1	Rotary Reactor
8EX1	Rumen Conveyor
29EX1	Rumen Loadout Bins
30EX1	Rumen Surge Bin

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:

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

and

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

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

The individual limitations are included in a IDEM, OAQ confidential file because the process weight rates are considered confidential by the source.

D.2.2 PSD Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP001-4673-00005, issued May 10, 1996, the amount of soybean grains processed after the grain dryers shall be limited to less than 1,368,750 tons per twelve (12) consecutive month period. This limit, in combination with the limits in Conditions D.1.3 and D.5.3, restricts the net increases of PM and PM10 emissions from the modification in 1996 to below the PSD significant levels of twenty-five (25) and fifteen (15) tons per year, respectively, and also satisfies the requirements of 326 IAC 6-3-2 (Process Operations). This limit is equivalent to the following individual limits:

Unit	PM Limit (lb/hr)	PM10 Limit (lb/hr)
1EX	0.516	0.320
4EX	1.181	0.230
5EX	1.684	0.255
7EX	0.351	0.254
13EX	7.38	4.43
14EX	7.38	4.43
21EX	17.7	10.8
23EX	3.28	1.64
6EX	0.056	0.008

This will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

- (a) In order to comply with Conditions D.2.1 and D.2.2, the baghouses, filters, and cyclones for PM control shall be in operation and control emissions from the listed facilities at all times that the facilities are in operation.
- (b) In order to comply with Conditions D.2.1 and D.2.2, dust control oil shall be applied at all times that facilities whose descriptions above mention oil dust suppressant are in operation.
- (c) In order to comply with Conditions D.2.1 and D.2.2, the self-cleaning screens for PM control shall be in operation and control emissions from the facilities whose descriptions above mention the use of self-cleaning screens at all times that these facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Once per shift visible emission notations of 13EX, 14EX and 23EX stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) Once per day visible emission notations of 6EL, 9EL, 12EL, 13EL, 15EL, 17EL vent 103EO, 4SP, 1EX, 3EX, 4EX, 5EX, 6EX, 7EX, 8EX, 9EX, 10EX, 11EX, 12EX, 21EX A, 21EX B, 25EX, 27EX, 29EX and 30EX stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) 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.

- (d) 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.
- (e) 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.
- (f) The Compliance Response Plan for these processes 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 deviation from this permit.

D.2.6 Parametric Monitoring

- (a) Alarms shall be operational on all cyclone high level indicators. If an alarm sounds, the Permittee shall take reasonable response steps. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) The Permittee shall record the total static pressure drop across the baghouses and filters controlling 6EL, 9EL, 12EL, 13EL, 15EL, 103EO, 4SP, 1EX, 4EX, 5EX, 6EX, 7EX, 9EX, 10EX, 11EX, 12EX, 25EX, 29EX and 30EX at least once per day when the processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the normal range of 0.5 to 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 - Preparation, Implementation, Records, and Reports. 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 deviation from 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 or at a frequency recommended by the manufacturer.

D.2.7 Baghouse, Filters, and Self-Cleaning Screen Inspections

An inspection shall be performed once per year of all bags, filters, and self-cleaning screens controlling the facilities when venting to the atmosphere. Inspections are optional when venting to the indoors. All defective bags and screens shall be replaced.

D.2.8 Broken or Failed Bag, Filter, or Screen Detection

In the event that bag or screen 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 deviation from this permit.

- (b) For single compartment baghouses, filters, and screens, 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.2.9 Cyclone Inspections

An inspection shall be performed once per year of all cyclones controlling the processes when venting to the atmosphere. Inspections are optional when venting to the indoors.

D.2.10 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. 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records of the amount of soybean grains processed after the grain dryers. This records is the same record that is required in Conditions D.1.11(a) and D.5.12(a).
- (b) To document compliance with Condition D.2.5(a), the Permittee shall maintain records of once per shift visible emission notations of the stack exhaust.
- (c) To document compliance with Condition D.2.5(b), the Permittee shall maintain records of once per day visible emission notations of the stack exhaust and 17EL vent exhaust.
- (d) To document compliance with Condition D.2.6(b), the Permittee shall maintain once per day records of the total pressure drop across the baghouse during normal operation when venting to the atmosphere. The Permittee shall also maintain records of any alarms that sound and the response steps taken.
- (e) To document compliance with Conditions D.2.7 and D.2.9, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.7 and D.2.9 and the dates the vents are redirected..
- (f) To document compliance with D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address 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 "responsible official" as defined by 326 IAC 2-7-1(34). This is the same report as required in Condition D.1.11 and D.5.12.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (ddd) One (1) natural gas fired heater , identified as 110EO, constructed in 2002, and exhausting to stack 110EO;
- (eee) One (1) natural gas fired steam generator #3, identified as 108EO1, constructed in 1994, and exhausting to stack 108EO;
- (fff) One (1) B & W coal fired boiler, identified as 1SP1, constructed in 1950, using multiple cyclones for PM control, and exhausting to stack 1SP;
- (ggg) One (1) Keeler coal fired boiler, identified as 2SP1, constructed in 1963, using multiple cyclones for PM control, and exhausting to stack 1SP;
- (hhh) One (1) Murray natural gas fired, vegetable oil-fired, waste oil-fired, and hazardous chemical fired boiler, identified as 3SP1, constructed in 1968, and exhausting to stack 1SP;

(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 2-7-5(1)]

D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3] [326 IAC 6-2-4]

- (a) 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) applies to the B&W boiler, Keeler boiler, and Murray boiler because they were constructed prior to September 21, 1983, the applicability date for this rule. Pursuant to this rule, the following particulate emission limitations exist:

Year	Unit	PM Limit (lb/MMBtu)
1950	1SP1 - B&W Boiler	0.8
1963	2SP1 - Keeler Boiler	0.8
1968	3SP1 - Murray Boiler	0.8

- (b) 326 IAC 6-2-4 (Particulate Emission Limitations for Source of Indirect Heating) applies to the natural gas fired steam generator #3 (108EO1) because it was constructed after September 21, 1983, the applicability date for this rule. Pursuant to this rule, the particulate emissions from this source shall be limits to less than 0.25 pound per million British thermal unit heat input.

D.3.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1-1, the sulfur dioxide emissions from the B&W boiler and Keeler boiler, when combusting coal, shall be less than 6.0 lb/MMBtu.

D.3.3 Particulate Matter (PM [326 IAC 12-1] [40 CFR 60, Subpart Dc]

Although the natural gas fired steam generator #3 (108EO1) is subject to 40 CFR Part 60, Subpart Dc, there are no emission limitations applicable, only record keeping requirements described in D.3.7.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.5 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-2]

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed six (6.0) pounds per MMBtu. Compliance shall be determined utilizing the following options:

- (a) Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier as described under 40 CFR 60.48c(f)(3). The certification shall include:
 - (1) The name of the coal supplier; and
 - (2) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and
 - (3) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and
 - (4) The methods used to determine the properties of the coal; or
- (b) Coal sampling and analyzing shall be performed using one of the following procedures:
 - (1) Minimum Coal Sampling Requirements and Analysis Methods:
 - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
 - (B) Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the proceeding eight (8) hours;
 - (C) Minimum sample size shall be five hundred (500) grams;
 - (D) Samples shall be composited and analyzed at the end of each calendar month;
 - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
 - (2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or
- (c) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emissions limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(c)]

- (d) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a), (b), (c), or (d) above shall not be refuted by evidence of compliance pursuant to the other method. This rule is not federally enforceable.

D.3.6 Used Oil Requirements [329 IAC 13-8]

Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:

- (1) Receipt of an EPA identification number as outlined in 329 IAC 13-8-3 (Notification),
- (2) Compliance with the used oil storage requirements specified in 329 IAC 13-8-5 (Used Oil Storage), and
- (3) Maintain records pursuant to 329 IAC 13-8-6 (Tracking).
- (4) The waste oil burned in the Murray boiler shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). The burning of mixtures of used oil and hazardous waste that is regulated by 329 IAC 3.1 is prohibited at this source.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Visible Emissions Notations

- (a) Once per shift visible emission notations of 1SP stack exhaust shall be performed during normal daylight operations when combusting coal, vegetable oil, waste oil or solvents and 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 these processes 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 deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in Condition D.3.2.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual coal usage since last compliance determination period;
 - (3) Sulfur content and heat content; and
 - (4) Sulfur dioxide emission rates.
- (b) Pursuant to 40 CFR Part 60, Subpart Dc, the owner or operator of 108EO1 shall record and maintain records of amounts of fuel combusted during each day.
- (c) To document compliance with Condition D.3.7, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust while combusting coal.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

- (a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period for unit 3SP1. The natural gas-fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34);
- (b) The natural gas boiler certification shall be submitted to the address 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 six (6) month period being reported.
- (c) Pursuant to 326 IAC 7-2, for the B&W boiler and Keeler boiler, a quarterly report of the calendar month average coal sulfur content, coal heat content, the sulfur dioxide emission rate in pounds per million Btu, and the total monthly coal consumption shall be submitted to the address 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 "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (iii) Hexane extraction system , identified as 24EX1, modified prior to 1980, with hexane emissions from the vent system controlled by a mineral oil absorber, and exhausting to stack 24EX1 (for reporting purposes, all other hexane emissions are collectively accounted for in the total hexane losses named 24EX);
- (jjj) One (1) pre-DT section on top of 'A' top dryer section, constructed in 1996, and one (1) 'A' DTDC top dryer section, constructed prior to 1980, with hexane emissions controlled by a mineral oil absorber and reported in 24EX;
- (kkk) One (1) 'A' DTDC middle dryer section, identified as 24EX3, constructed prior to 1980, with hexane emissions controlled by a mineral oil absorber, and reported in 24EX;
- (lll) One (1) 'A' DTDC bottom cooler section, identified as 24EX4, constructed prior to 1980, with hexane emissions controlled by a mineral oil absorber, and reported in 24EX;
- (mmm) One (1) pre-DT section on top of 'B' top dryer section, constructed in 1996, and one (1) 'B' DTDC top dryer section, constructed prior to 1980, both identified as 24EX5, with hexane emissions controlled by a mineral oil absorber, and reported in 24EX;
- (nnn) One (1) 'B' DTDC middle dryer section, identified as 24EX6, constructed prior to 1980, with hexane emissions controlled by a mineral oil absorber, and reported in 24EX;
- (ooo) One (1) 'B' DTDC bottom cooler section, identified as 24EX7, constructed prior to 1980, with hexane emissions controlled by a mineral oil absorber, and reported in 24EX;
- (ppp) One (1) meal cooler, identified as 21EX, constructed in 1996, with hexane emissions controlled by a mineral oil absorber, and reported in 24EX;
- (qqq) Two (2) hexane storage tanks, identified as 24EX8a and 24EX8b, constructed in 1995 and 2005, respectively, and vented to the mineral oil absorber inlet;
- (rrr) Wastewater system containing hexane, identified as 24EX9, constructed prior to 1980, and exhausting at the plant treatment facility;
- (sss) One (1) refined oil hot well, identified as 24EX10, constructed in 1975;
- (ttt) One (1) sampling/hexane unloading port, identified as 24EX11, and with no control.

(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 2-7-5(1)]

D.4.1 PSD Limit [326 IAC 2-2][40CFR 52.21]

Pursuant to CP(002)2005, issued August 23, 1991, the hexane usage for all of the oil extraction facilities (24EX1-24EX11) combined shall be limited to less than 330,000 gallons per twelve (12) consecutive month period to ensure that the increase in hexane emissions from these units remains below 39.2 tons per year. This will ensure that 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 does not apply to this modification.

D.4.2 Storage Vessels [40 CFR 60, Subpart Kb][326 IAC 12]

Pursuant to 40 CFR Part 60, Subpart Kb, records must be kept for the hexane storage tanks identified as 24EX8a and 24EX8b. The record keeping requirements are specified in the Record Keeping Requirements condition of this section. No other subpart Kb provisions apply.

D.4.3 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart GGGG.

D.4.4 Solvent Extraction for Vegetable Oil Production NESHAP [40 CFR Part 63, Subpart GGGG][326 IAC 14]

Pursuant to 40 CFR Part 63, Subpart GGGG (National Emission Standards for Hazardous Air Pollutants: Solvent Extraction for Vegetable Oil Production), the hexane emissions for the soybean conventional oilseed process is limited to 0.2 gallons of hexane lost per ton of oilseed processed. This limitation is a solvent loss factor to be applied in comparison to a loss of solvent at a n-hexane content of 64%. The compliance date for this rule is April 12, 2004. Compliance with the hexane limit shall be demonstrated using the following equation found in 40 CFR 63.2840:

$$\text{Compliance Ratio} = \frac{\text{Actual HAP Loss}}{\text{Allowable HAP Loss}}$$

This equation can also be expressed as a function of total solvent loss as shown below and found in 40 CFR 63.2840:

$$\text{Compliance Ratio} = \frac{f * \text{Actual Solvent Loss}}{0.64 * \sum ((\text{Oilseed})_i * (\text{SLF})_i)}$$

where f = The weighted average volume fraction of HAP in solvent received during the previous 12 operating months, as determined in 40 CFR 63.2854, dimensionless;

0.64 = The average volume fraction of HAP in solvent in the baseline performance data, dimensionless;

Actual Solvent Loss = Gallons of actual solvent loss during previous 12 operating months, as determined in 40 CFR 63.2853;

Oilseed = Tons of each oilseed type "i" processed during the previous 12 operating months, as shown in 40 CFR 63.2855; and

SLF = The corresponding solvent loss factor (gal/ton) for oilseed "i" as shown in Table 1 of 40 CFR 63.2840.

After 12 operating months, the source shall calculate the compliance ratio by the end of each calendar month following an operating month using the second equation. When calculating the compliance ratio, the following conditions shall be considered:

- (1) If the source processes any quantity of listed oilseeds in a calendar month and the source is not operating under an initial startup period or malfunction period subject to 40 CFR 63.2850, then the source shall categorize the month as an operating month, as defined in 40 CFR 63.2872.
- (2) The 12-month compliance ratio may include operating months occurring prior to a source shutdown and operating months that follow after the source resumes operation.

- (3) If the source shuts down and processes no listed oilseed for an entire calendar month, then the source shall categorize the month as a nonoperating month, as defined in 40 CFR 63.2872. Exclude any nonoperating months from the compliance ratio determination.
- (4) If the source is subject to an initial startup period as defined in 40 CFR 60.2872, the source shall exclude from the compliance ratio determination any solvent and oilseed information recorded for the initial startup period.
- (5) If the source is subject to a malfunction period as defined in 40 CFR 63.2872, the source shall exclude from the compliance ratio determination any solvent and oilseed information recorded for the malfunction period.

If the compliance ratio is less than or equal to 1.00, the source is in compliance with the HAP emission requirement for the previous operating month.

D.4.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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.4.6 Volatile Organic Compounds (VOC)

In order to comply with Condition D.4.1, the mineral oil absorber for VOC control shall be in operation and control emissions from the listed facilities at all times when the facilities are in operation.

D.4.7 Compliance Requirements [40 CFR Part 63, Subpart GGGG]

- (a) Pursuant to 40 CFR 63.2850, the source shall:
 - (1) Submit the following necessary notifications in accordance with 40 CFR 63.2860:
 - (A) Initial notifications for existing source by August 10, 2001. The source submitted the initial notification on August 6, 2001; and
 - (B) Notification of compliance status, no later than 60 days after determining your initial 12 operating months compliance ratio. For an existing source, such as this source, the notification must be submitted no later than June 12, 2004 or the date as stated in 40 CFR 63.2860.
 - (2) Develop and implement a plan for demonstrating compliance in accordance with 40 CFR 63.2851.
 - (3) Develop a written startup, shutdown, and malfunction (SSM) plan in accordance with the provisions in 40 CFR 63.2852.
 - (4) Maintain all the necessary records used to demonstrate compliance with this subpart in accordance with 40 CFR 63.2862.
 - (5) Submit the following reports:
 - (A) Annual compliance certifications in accordance with 40 CFR 63.2861(a);
 - (B) Periodic SSM reports in accordance with 40 CFR 63.261(c); and
 - (C) Immediate SSM reports in accordance with 40 CFR 63.261(d).

- (6) Submit all notifications and reports and maintain all records required by the General Provisions for performance testing on the control device that destroys solvent.
- (b) A malfunction as defined in 40 CFR 63.2 is a sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or process equipment to function in a usual manner. If the existing source experiences an unscheduled shutdown as a result of a malfunction, continues to operate during a malfunction (including the period reasonable necessary to correct the malfunction), or starts up after a shutdown resulting from a malfunction, then the source must meet the requirements associated with one of two compliance options. Routine or scheduled process startups and shutdowns resulting from, but not limited to, market demands, maintenance activities, and switching types of oilseed processed, are not startups or shutdowns resulting from a malfunction and, therefore do not qualify for this provision. Within 15 days of the beginning date of the malfunction, the source must choose to comply with one of the following options listed:
- (1) Normal operation. The source must meet all of the requirements listed in 40 CFR 63.2850(a) and (b).
 - (2) Malfunction period. Throughout the malfunction period, the source must meet all of the requirements listed in 40 CFR 63.2850(a) and Table 1 of 40 CFR 63.2850 for sources operating during a malfunction period. At the end of the malfunction period, the source must then meet all of the requirements of Table 1 of 40 CFR 63.2850 for sources under normal operation.

D.4.8 Compliance Plan [40 CFR Part 63, Subpart GGGG]

- (a) Pursuant to 40 CFR 63.2851, the source must develop and implement a written plan for demonstrating compliance that provides the detailed procedures the source will follow to monitor and record data necessary for demonstrating compliance with this subpart. Procedures followed for quantifying solvent loss from the source and amount of oilseed processed vary from source to source because of site-specific factors such as equipment design characteristics and operating conditions. Typical procedures include one or more accurate measurement methods such as weigh scales, volumetric displacement, and material mass balance. Because the industry does not have a uniform set of procedures, the source must develop and implement a site-specific plan for demonstrating compliance before the compliance date for the source. The source shall keep the plan on-site and readily available as long as the source is operational. If the owner makes any changes to the plan for demonstrating compliance, the previous versions of the plan must be kept and made readily available for inspection for at least 5 years after each revision. The plan for demonstrating compliance must include the following:
- (1) The name and address of the owner or operator;
 - (2) The physical address of the vegetable oil production process;
 - (3) A detailed description of all methods of measurement the source will use to determine solvent losses, HAP content of solvent, and the tons of each type of oilseed processed;
 - (4) When each measurement will be made;
 - (5) Examples of each calculation the source will use to determine compliance status. Include examples how to convert data measured with one parameter to the terms for use in compliance determination;

- (6) Example logs of how data will be recorded; and
 - (7) A plan to ensure that the data continue to meet compliance demonstration needs.
- (b) IDEM, OAQ may require the source to revise the plan for demonstrating compliance. IDEM, OAQ may require reasonable revisions if the procedures lack detail, are inconsistent or do not accurately determine solvent loss, HAP content of the solvent, or the tons of oilseed processed.

D.4.9 Startup, Shutdown, and Malfunction Plan [40 CFR Part 63, Subpart GGGG]

Pursuant to 40 CFR 63.2852, the source must develop a written SSM plan in accordance with 40 CFR 63.6(e)(3) and implement the plan, when applicable. The SSM plan must be completed before the compliance date for the source. The source must keep the SSM plan on-site and readily available as long as the source is operational. The SSM plan provides detailed procedures for operating and maintaining the source to minimize emissions during a qualifying SSM event for which the source chooses the 40 CFR 63.2580(e)(2) malfunction period, or the 40 CFR 63.2850(c)(2) or (d)(2) initial startup period. The SSM plan must specify a program of corrective action for malfunctioning process and air pollution control equipment and reflect the best practices now in use by the industry to minimize emissions. Some or all of the procedure may come from plans the source has developed for other purposes such as a Standard Operating Procedure manual or an Occupational Safety and Health Administration Process Safety Management plan. To qualify as a SSM plan, other such plans must meet all the applicable requirements of this NESHAP.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.10 Monitoring

- (a) To document compliance with Condition D.4.1, the mineral oil absorption vent VOC (hexane) emission rate shall be determined daily by measuring the airflow rate and the concentration of hexane in the air stream. This concentration will be determined daily by measuring percent Lower Explosive Limit (LEL). If the air flow meter proves unreliable, airflow can be determined by calculations.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.11 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records of the hexane usage for the oil extraction facilities.
- (b) To document compliance with Condition D.4.2, the Permittee shall maintain a record showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
- (c) To document compliance with Condition D.4.4 and 40 CFR Part 63, Subpart GGGG, the Permittee shall comply with the following:
 - (1) The following information must be kept on-site and readily available as long as the source is operational:
 - (A) Compliance Plan; and
 - (B) Startup, Shutdown, and Malfunction Plan.

- (2) For the solvent inventory, the following information must be recorded in accordance with the source plan for demonstrating compliance:
 - (A) Dates that define each operating status period during a calendar month;
 - (B) The operating status of the source such as normal operation, nonoperating, initial startup period, malfunction period, or exempt operation for each recorded time interval;
 - (C) The gallons of extraction solvent in the inventory on the beginning and ending dates of each normal operating period;
 - (D) The gallons of all extraction solvent received, purchased, and recovered during each calendar month;
 - (E) All extraction solvent inventory adjustments, additions or subtractions. The owner must document the reason for the adjustment and justify the quantity of the adjustment;
 - (F) The total solvent loss for each calendar month, regardless of the source operating status; and
 - (G) The actual solvent loss in gallons for each operating month.
- (3) For the weighted average volume fraction of HAP in the extraction solvent, the owner must record the following items:
 - (A) The gallons of extraction solvent received in each delivery;
 - (B) The volume fraction of each HAP exceeding 1 percent by volume in each delivery of extraction solvent; and
 - (C) The weighted average volume fraction of HAP in extraction solvent received since the end of the last operating month as determined in accordance with 40 CFR 63.2854(b)(2).
- (4) For each type of listed oilseed processed, record the following items, in accordance with the source plan for demonstrating compliance:
 - (A) The dates that define each operating period. The dates must be the same as the dates entered for the extraction solvent inventory.
 - (B) The operating status of the source such as normal operation, nonoperating, initial startup period, malfunction period, or exempt operation for each recorded time interval. On the log for each type of listed oilseed that is being processed during a normal operating period, the owner shall record which type of listed oilseed is being processed in addition to the source operating status.
 - (C) The oilseed inventory for the type of listed oilseed being processed on the beginning and ending dates of each normal operating period.
 - (D) The tons of each type of oilseed received at the affected source each normal operating period.

- (E) All listed oilseed inventory adjustments, additions, or subtractions for normal operating periods. The owner must document the reason for adjustment and justify the quantity of the adjustment.
 - (F) The tons of each type of listed oilseed processed during each operating month.
- (5) After the source has processed listed oilseed for 12 operating months, and is not operating during an initial startup period as described in 40 CFR 63.2850(c)(2) or (d)(2), or a malfunction period as described in 40 CFR 63.2850(e)(2), the following items must be recorded by the end of the calendar month following each operating month:
- (A) The 12 operating months rolling sum of the actual solvent loss in gallons as described in 40 CFR 63.2853(c).
 - (B) The weighted average volume fraction of HAP in extraction solvent received for the previous 12 operating months as described in 40 CFR 63.2854(b)(3).
 - (C) The 12 operating months rolling sum of each type of listed oilseed processes at the affected source in tons as described in 40 CFR 6355(c).
 - (D) A determination of the compliance ratio. Using the values from 40 CFR 63.2853, 63.2854, 63.2855 and Table 1 of 40 CFR 63.2840, calculate the compliance ratio using equation 2 of 40 CFR 63.2840.
 - (E) A statement of whether the source is in compliance with all of the requirements of the subpart. This includes a determination of whether the source has met all of the applicable requirements of 40 CFR 63.2850.
- (6) For each SSM event subject to an initial startup period as described in 40 CFR 63.2850(c)(2) or (d)(2), or a malfunction period as described in 40 CFR 63.2850(e)(2), the following items shall be recorded by the end of the calendar month following each month in which the initial startup period or malfunction period occurred:
- (A) A description and date of the SSM event, its duration, and reason it qualifies as an initial startup or malfunction;
 - (B) An estimate of the solvent loss in gallons for the duration of the initial startup or malfunction period with supporting documentation; and
 - (C) A checklist or other mechanism to indicate whether the SSM plan was followed during the initial startup or malfunction period.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.12 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) To document compliance with 40 CFR Part 63, Subpart GGGG, the Permittee must submit annual compliance certifications. The first annual compliance certification is due no later than 60 days after determining the initial 12 operating months compliance ratio. For an existing source, such as this source, the notification must be submitted no later than 50 calendar months after the effective date of this subpart, April 12, 2001 or the date as stated in 40 CFR 63.2860. Each subsequent annual compliance certification is due 12 months after the previous annual compliance certification. The annual compliance certification provides the compliance status for each operating month during the 12 calendar months period ending 60 days or the time frame as stated in 40 CFR 63.2860 prior to the date on which the report is due. The annual certification shall include the following information:
- (1) The name and address of the owner or operator.
 - (2) The physical address of the vegetable oil production process.
 - (3) Each listed oilseed type processed during the 12 calendar months period covered by the report.
 - (4) Each HAP identified under 40 CFR 63.2854(a) as being present in concentrations greater than 1 percent by volume in each delivery of solvent received during the 12 calendar months period covered by the report.
 - (5) A statement designating the source as major source of HAP.
 - (6) A compliance certification to indicate whether the source was in compliance for each compliance determination made during the 12 calendar period covered by the report. For each such compliance determination, the source must include a certification of the following items:
 - (A) The source is following the procedures described in the plan for demonstrating compliance.
 - (B) The compliance ratio is less than or equal to 1.00.
- (c) To document compliance with 40 CFR Part 63, Subpart GGGG, the Permittee shall submit a deviation notification report for each compliance determination made in which the ratio exceeded 1.00 as determined under 40 CFR 63.2840(c). The report shall be submitted by the end of each month following the calendar month in which the deviation was determined. The deviation notification shall include the following:
- (1) The name and address of the owner or operator.
 - (2) The physical address of the vegetable oil production process.
 - (3) Each listed oilseed type processed during the 12 calendar months period for which a deviation was determined.

- (4) The compliance ratio comprising the deviation. The owner may reduce the frequency of submittal of the deviation notification report if the IDEM, OAQ does not object as provided in 40 CFR 63.10(e)(3)(iii).
- (d) To document compliance with 40 CFR Part 63, Subpart GGGG, if the Permittee chooses to operate the source under an initial startup period subject to 40 CFR 63.2850(c)(2) or (d)(2) or a malfunction period subject to 40 CFR 63.2850(e)(2), the Permittee shall submit a periodic SSM report by the end of the calendar month following each month in which the initial startup period or malfunction period occurred. The periodic SSM report shall include the following:
 - (1) The name, title, and signature of the source's responsible official who is certifying that the report accurately states all actions taken during the initial startup or malfunction period were consistent with the SSM plan.
 - (2) A description of the events occurring during the time period, the date and duration of the events, and the reason the time interval qualifies as an initial startup period or malfunction period.
 - (3) An estimate of the solvent loss during the initial startup or malfunction period with supporting documentation.
- (e) To document compliance with 40 CFR Part 63, Subpart GGGG, if the Permittee handles a SSM during an initial startup period subject to 40 CFR 63.2850(c)(2) or (d)(2) or a malfunction period subject to 40 CFR 63.2850(e)(2) differently from procedures in the SSM plan, then the Permittee shall submit an immediate SSM report. Immediate SSM reports consist of a telephone call or facsimile transmission to the responsible agency within 2 working days after starting actions inconsistent with the SSM plan, followed by a letter within 7 working days after the end of the event. The letter shall include the following:
 - (1) The name, title, and signature of the source's responsible official who is certifying that the accuracy of the report, an explanation of the event, and the reasons for not following the SSM plan.
 - (2) A description and date of the SSM event, its duration, and reason it qualifies as a SSM.
 - (3) An estimate of the solvent loss for the duration of the SSM event with supporting documentation.

SECTION D.5 FACILITY OPERATION CONDITIONS

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

- (uuu) One (1) natural gas fired grain dryer #1, identified as 16EL, constructed in 1986, using self-cleaning screens for PM control, and exhausting to stack 16EL;
- (vvv) The following soybean processing equipment, identified as 17EX2, modified in 1987, using a cyclone for PM control, and exhausting to stack 17EX:
- (1) One (1) flaking roll #8, constructed in 1981; and
 - (2) One (1) 'B' flake e/w drag, constructed in 1980.
- (www) Two (2) conditioners, identified as 31EX1 and 31EX2, constructed in 2002, and exhausting internally.

(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 2-7-5(1)]

D.5.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the affected facilities described in this section except when otherwise specified in 40 CFR Part 60, Subpart DD.

D.5.2 New Source Performance Standards (NSPS) Grain Elevators [326 IAC 12] [40 CFR Subpart DD 60.302]

Pursuant to 40 CFR Part 60, Subpart DD 60.302 is applicable to 16EL1 (#1 grain dryer) and 19EL1 (#2 grain dryer). However, pursuant to 40 CFR Part 60, Subpart DD 60.302(a) there are no applicable requirements for these column grain dryers because the column grain dryers have 0.083 inch diameter screen openings in the column plate, which is less than 0.094 inch diameter openings.

D.5.3 PSD Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP001-4673-00005, issued May 10, 1996, the amount of soybean grains processed after the grain dryers shall be limited to less than 1,368,750 tons per twelve (12) consecutive month period. This limit, in combination with the limits in Conditions D.1.3 and D.2.2, restricts the net increases of PM and PM10 emissions to below the PSD thresholds and also satisfies the requirements of 326 IAC 6-3-2 (Process Operations). This limit is equivalent to limiting unit 17EX to less than 2.51 pounds per hour of PM and less than 1.52 pounds per hour of PM10. This will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.5.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the following units shall be limited by the following equation:

Unit	Description
16EL1	Grain Dryer #1
17EX2	Flaking Roll #8, 'B' Flake E/W Drag
31EX1	Conditioner
31EX2	Conditioner

The pounds per hour limitation was calculated with 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:

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

and

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 individual limitations are included in a IDEM, OAQ confidential file because the source considers the process weight weights confidential.

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.5.6 Particulate Matter (PM)

- (a) In order to comply with Conditions D.5.3 and D.5.4, the self-cleaning screens for PM control shall be in operation and control emissions from 16EL1 at all times that the process is in operation.
- (b) In order to comply with Conditions D.5.3 and D.5.4, the cyclones for PM control shall be in operation and control emissions from the listed facilities at all times that the facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.7 Visible Emissions Notations

- (a) Once per day visible emission notations of unit 16EL and 17EX stack exhaust shall be performed 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 these processes 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 deviation from this permit.

D.5.8 Self-Cleaning Screen Inspections

An inspection shall be performed once per year of all self-cleaning screens controlling the facilities when venting to the atmosphere. All defective screens shall be replaced.

D.5.9 Broken or Failed Screen 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 deviation from this permit.
- (b) For single compartment baghouses, 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.5.10 Cyclone Inspections

An inspection shall be performed once per year of all cyclones controlling the processes when venting to the atmosphere. Inspections are optional when venting to the indoors.

D.5.11 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. 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.12 Record Keeping Requirements

- (a) To document compliance with Condition D.5.3, the Permittee shall maintain records of the amount of soybean grains processed after the grain dryers. This records is the same record that is required in Conditions D.1.11(a) and D.2.11(a).
- (b) To document compliance with Condition D.5.7(a), the Permittee shall maintain records of once per day visible emission notations of the stack exhaust of unit 16EL and 17EX.
- (c) To document compliance with Conditions D.5.8 and D.5.10, the Permittee shall maintain records of the results of the inspections required under Conditions D.5.8 and D.5.10 and the dates the vents are redirected.
- (d) To document compliance with D.5.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.5.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.3 shall be submitted to the address 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 "responsible official" as defined by 326 IAC 2-7-1(34). This is the same report as required by Conditions D.1.11 and D.2.12.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Bunge North America
Source Address: 1200 North 2nd Street, Decatur, Indiana 46733
Mailing Address: P.O. Box 1002, Decatur, Indiana 46733
Part 70 Permit No.: T001-5610-00005

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:

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

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Bunge North America
Source Address: 1200 North 2nd Street, Decatur, Indiana 46733
Mailing Address: P.O. Box 1002, Decatur, Indiana 46733
Part 70 Permit No.: T001-5610-00005

This form consists of 2 pages

Page 1 of 2

<p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The 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• The 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**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Bunge North America
Source Address: 1200 North 2nd Street, Decatur, Indiana 46733
Mailing Address: P.O. Box 1002, Decatur, Indiana 46733
Part 70 Permit No.: T001-5610-00005

<input checked="" type="radio"/> Natural Gas Only
<input checked="" type="radio"/> Alternate Fuel burned
From: _____ To: _____

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: _____
Phone: _____
Date: _____

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Bunge North America
Source Address: 1200 North 2nd Street, Decatur, Indiana 46733
Mailing Address: P.O. Box 1002, Decatur, Indiana 46733
Part 70 Permit No.: T001-5610-00005
Facility: Oil Extraction Facilities
Parameter: Hexane Usage
Limit: Less than 330,000 gallons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

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

Part 70 Quarterly Report

Source Name: Bunge North America
 Source Address: 1200 North 2nd Street, Decatur, Indiana 46733
 Mailing Address: P.O. Box 1002, Decatur, Indiana 46733
 Part 70 Permit No.: T001-5610-00005
 Facility: Grain Processing Facilities
 Parameter: Soybean grain processed after the grain dryers
 Limit: Less than 1,368,750 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column
	This Month	Previous 11 Months	12 Month Total
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

PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Bunge North America
Source Address: 1200 North 2nd Street, Decatur, Indiana 46733
Mailing Address: P.O. Box 1002, Decatur, Indiana 46733
Part 70 Permit No.: T001-5610-00005

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report is an affirmation that the source has met all the requirements stated in this permit. 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".</p>	
<p><input type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Addendum to Technical Support Document (TSD) for a Significant Permit Modification
to an existing Part 70 Operating Permit

Source Background and Description

Source Name:	Bunge North America F.K.A. Central Soya
Source Location:	1200 North 2nd Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	2075, 5153, 2048
Operation Permit No.:	T001-5610-00005
Operation Permit Issuance Date:	July 3, 2002
Permit Resolution No.:	001-16018-00005
Permit Reviewer:	James Farrell

On September 7, 2005, the Office of Air Quality (OAQ) had a notice published in the Decatur Daily Democrat in Decatur, Indiana, stating that Bunge North America had appealed the Part 70 Operating Permit relating to the operation of a grain handling, animal feed production, soybean meal production, and soybean oil extraction plant. The notice also stated that OAQ proposed to issue a Significant Permit Modification for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed. Language that has been deleted is indicated with ~~strikeout~~ and new language is indicated with bold type.

Following are a summary of comments received during the Public Notice period.

Comment No. 1

On September 28, 2005, Bunge submitted the following:

"Please incorporate changes made as a result of the Administrative Amendment (AA) T001-21530-00005 being issued on September 23, 2005, which were not previously captured in this modification."

Revision No. 1

The following revisions are being included to address changes as a result of the issuance of the AA T001-21530-00005. The unit identifications will be revised as follows in Sections A.2 and D.4:

~~(qqqaaa)~~ Two (2) hexane storage tanks, identified as 24EX8a and 24EX8b, constructed in 1995 and 2005, respectively, and vented to the mineral oil absorber inlet;

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

Technical Support Document (TSD) for a Significant Permit Modification
to an existing Part 70 Operating Permit

Source Background and Description

Source Name:	Bunge North America F.K.A. Central Soya
Source Location:	1200 North 2nd Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	2075, 5153, 2048
Operation Permit No.:	T001-5610-00005
Operation Permit Issuance Date:	July 3, 2002
Permit Resolution No.:	001-16018-00005
Permit Reviewer:	James Farrell

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Administrative Review Request from Bunge North America relating to the operation of a grain handling, animal feed production, soybean meal production, and soybean oil extraction plant.

History

Bunge North America (Bunge) filed a petition for administrative review of the Part 70 Operating Permit T001-5610-00005, issued on July 3, 2002, with the Office of Environmental Adjudication on August 1, 2002. The petition was filed as Cause No. 02-A-J-2934. On February 5, 2004, IDEM, OAQ and the source met to discuss a majority of the issues relating to this petition. On March 17, 2004, Bunge submitted a summary of the February 5th meeting and additional information to further clarify or finalize the remaining issues of this petition. Some of the issues of the petition have been resolved or withdrawn as a result of the February 5th meeting. On October 18, 2004 IDEM, OAQ and the source met to finalize the remaining issues and draft documents were presented for additional input from the source. On November 3, 2004, the source submitted responses to the draft document. This Significant Permit Modification resolves all issues relating to the appealed permit. The issues are addressed in this permit modification and are as follows. Language that has been deleted is indicated with ~~strikeout~~ and new or additional language is indicated with **bold type**.

Appeal Issues

Appeal Issue No. 1

Bunge objects, in Condition A.1, to the identification of the Responsible Official by given name, rather than by organizational title. Since personnel changes can occur frequently, but changes to the management structure of the Facility usually do not, Bunge recommends that the Responsible Official be identified by title.

Response No. 1

IDEM, OAQ has reviewed this request and has no objections. The change shall be as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary grain handling, animal feed production, soybean meal production, and soybean oil extraction plant.

Responsible Official: **Doyle R. Smith Plant Manager**

Appeal Issue No. 2

Bunge objects to the following descriptions of emission units and pollution control equipment in Condition A.2 and in the applicable Section D "Facility Descriptions": (g); (h); (j); (k); (r); (s); (ff); (gg); (ww); (xx); (yy); (zz); (aaa); (bbb); (ccc); (mmm); (nnn); (sss); (ttt); (uuu); (vvv); (www); (xxx); (yyy); (zzz); (cccc); (eeee); (ffff); and (hhhh) because they are inaccurate. Emission units (z), (aa); (bb); (cc); (dd); and (ee) should be removed from the permit because the units have been removed from the facility. Unit (gggg) should be removed from the permit because it does not vent to the atmosphere.

Response No. 2

The pellet cooler units, identified as 1EF1, the grinding equipment, identified as 2EF1 and 2EF2, the feed ingredient receiving, identified as 3EF1, the bulk loadout, identified as 4EF1, the micro room, identified as 5EF1, the Dowtherm heater, identified as 105EO1, the outside conditioner, identified as 17EX1 and the Lime conveying, identified as 5SP1 have been removed from service. IDEM, OAQ has removed these from the Part 70 Operating Permit.

The natural gas fired dryers unit descriptions, as found in descriptions (g) and (h), (r) and (s) and (eeee) and (ffff) have all been combined into the first unit description, respectively, with unit descriptions (h), (s) and (ffff) being deleted.

The petitioner provided additional information related to the description of the Hexane extraction system where all the units (ww)-(ccc), now (nn)-(tt) and (ttt)-(zzz), now (jjj)-(ppp) capture and direct, for reporting purposes, all Hexane to stack 24EX1, as described in unit description (sss), now (iii).

The unit descriptions letter I.D.'s have been revised as needed. In addition to the following revisions to the descriptions in Condition A.2, the respective revisions to Sections D.1, D.2, D.3, D.4 and D.5 "Facility Descriptions" and as required in the respective D Sections have been revised to reflect these changes.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (e) The following grain elevator components, together identified as 10EL1, using a baghouse and oil suppressant for PM control, and exhausting to stack 10EL:
 - (1) One (1) rail loadout, constructed in 1984;
 - (2) One (1) rail receiving, constructed in 1960;**
 - (32) One (1) north leg, constructed prior to 1960; and**
 - (43) One (1) south leg, constructed prior to 1960;**
- (g) One (1) **natural gas fired** grain dryer #2, identified as 19EL1, constructed in 1995, using self-cleaning screens for PM control, and exhausting to ~~stack~~ **vent** 19EL;

- (h) ~~One (1) natural gas dryer #2 associated with grain dryer #2, identified as 19EL2, constructed in 1995, and exhausting to stack 19EL;~~
- (ij) Silo bin vents, identified as 3EL4, constructed prior to 1977, using soybean oil as a dust suppressant, and exhausting to ~~stack vent~~ 3EL;
- (jk) Silo direct loadout, identified as 4EL1, constructed prior to 1977, using soybean oil as a dust suppressant, ~~and exhausting to stack 4EL;~~
- (qf) Two (2) **natural gas fired** grain dryers, #4 and #5, identified as 17EL1, constructed in the 1960's, using self-cleaning screens for PM control, and exhausting to ~~stack vent~~ 17EL;
- (s) ~~Two (2) natural gas fired dryers, #4 and #5, associated with grain dryers #4 and #5 respectively, identified as 17EL2, constructed in the 1960's, and exhausting to stack 17EL;~~
- (y) ~~Lime conveying, identified as 5SP1, constructed in 1981, using a baghouse for PM control and exhausting to stack 5SP;~~
- (z) ~~One (1) vertical pellet cooler, constructed in 1967, and one (1) horizontal pellet cooler, constructed in the 1950's, identified as 1EF1, using a cyclone for PM control;~~
- (aa) ~~One (1) corn grinding equipment, identified as 2EF1, constructed in 1992, using a cyclone for PM control.~~
- (bb) ~~Ingredient grinding equipment, identified as 2EF2, constructed in the early 1970's;~~
- (cc) ~~Feed Ingredient receiving, identified as 3EF1, constructed in the early 1970's;~~
- (dd) ~~Bulk loadout, identified as 4EF1, constructed in the early 1970's;~~
- (ee) ~~One (1) micro room, identified as 5EF1, constructed in the 1940's;~~
- (wff) Six (6) flaking rolls, #1, #2, #3, #4, #5, and #6, constructed in 1996, and B flake n/s drag, constructed in 1991, all identified together as 1EX1, sharing ~~Vox~~ **fabric** filters with 1EX2 for PM control, and exhausting to stack 1EX;
- (xgg) One (1) flaking roll #14 and flaking roll discharge #14, identified as 1EX2, constructed in 1991, sharing ~~Vox~~ **fabric** filters with 1EX1 for PM control, and exhausting to stack 1EX;
- (nnww) One (1) pre-DT section on top of 'A' top dryer section, constructed in 1996, and exhausting to 'A' top dryer section for PM control and one (1) 'A' top dryer section, identified as 13EX1, constructed in 1980, using a cyclone for PM control, exhausting to stack 13EX, with hexane emissions **reported in** ~~directed to stack 24EX;~~
- (ooxx) One (1) 'A' middle dryer section, identified as 13EX2, constructed in 1980, using a cyclone for PM control, exhausting to stack 13EX, with hexane emissions **reported in** ~~directed to stack 24EX;~~
- (ppyy) One (1) 'A' bottom cooler section, identified as 13EX3, constructed in 1980, using a cyclone for PM control, exhausting to stack 13EX, with hexane emissions **reported in** ~~directed to stack 24EX;~~
- (qqzz) One (1) pre-DT section on top of 'B' top dryer section, constructed in 1996, and exhausting to 'B' top dryer section for PM control, and one (1) 'B' top dryer section, identified as 14EX1, constructed in 1980, using a cyclone for PM control, exhausting to stack 14EX, with hexane emissions **reported in** ~~directed to stack 24EX;~~
- (rraaa) One (1) 'B' middle dryer section, identified as 14EX2, constructed in 1980, using a cyclone for PM control, exhausting to stack 14EX, with hexane emissions **reported in** ~~directed to stack 24EX;~~

- ~~(ssbbb)~~ One (1) 'B' bottom cooler section, identified as 14EX3, constructed in 1980, using a cyclone for PM control, exhausting to stack 14EX, with hexane emissions **reported in directed to stack 24EX**;
- ~~(ttee)~~ One (1) meal cooler, identified as 21EX, constructed in 1996, using two (2) cyclones for PM control and exhausting to stacks 21EX-A and 21EX-B, with hexane emissions **reported in directed to stack 24EX**;
- ~~(mmm)~~ One (1) natural gas fired Dowtherm heater #1, identified as 105EO1, constructed in 1969, and exhausting to stack 105EO;
- ~~(dddnn)~~ One (1) natural gas fired Dowtherm heater #2, identified as 106EO1 110EO, constructed in 1976 **2002**, and exhausting to stack ~~106EO~~**110EO**;
- ~~(iiiss)~~ Hexane **extraction system** recovery, identified as 24EX1, **modified prior to** constructed in 1980, with hexane emissions **from the vent system** controlled by a mineral oil absorber, and exhausting to stack 24EX1 **(for reporting purposes, all other hexane emissions are collectively accounted for in the total hexane losses named 24EX)**;
- ~~(jjjtt)~~ One (1) pre DT section on top of 'A' top dryer section, constructed in 1996, and one (1) 'A' DTDC top dryer section, constructed **prior to** in 1980, both identified as 24EX2, with hexane emissions controlled by a mineral oil absorber and ~~exhausting to stack 24EX~~ **reported in 24EX**;
- ~~(kkkuu)~~ One (1) 'A' DTDC middle dryer section, identified as 24EX3, constructed **prior to** in 1980, with hexane emissions controlled by a mineral oil absorber, and ~~exhausting to stack 24EX~~ **reported in 24EX**;
- ~~(lllww)~~ One (1) 'A' DTDC bottom cooler section, identified as 24EX4, constructed **prior to** in 1980, with hexane emissions controlled by a mineral oil absorber, and ~~exhausting to stack~~ **reported in 24EX**;
- ~~(mmmwww)~~ One (1) pre-DT section on top of 'B' top dryer section, constructed in 1996, and one (1) 'B' DTDC top dryer section, constructed **prior to** in 1980, both identified as 24EX5, with hexane emissions controlled by a mineral oil absorber, and ~~exhausting to stack~~ **reported in 24EX**;
- ~~(nnnxxx)~~ One (1) 'B' DTDC middle dryer section, identified as 24EX6, constructed **prior to** in 1980, with hexane emissions controlled by a mineral oil absorber, and ~~exhausting to stack~~ **reported in 24EX**;
- ~~(oooyyy)~~ One (1) 'B' DTDC bottom cooler section, identified as 24EX7, constructed **prior to** in 1980, with hexane emissions controlled by a mineral oil absorber, and ~~exhausting to stack~~ **reported in 24EX**;
- ~~(pppzzz)~~ One (1) meal cooler, identified as 21EX, constructed in 1996, with hexane emissions controlled by a mineral oil absorber, and ~~exhausting to sack~~ **reported in 24EX**;
- ~~(rrrbbb)~~ Wastewater system containing hexane, identified as 24EX9, constructed **prior to** in 1980, and exhausting at the plant treatment facility;
- ~~(ssseeee)~~ One (1) refined oil hot well, identified as 24EX10, constructed in 1975, ~~and exhausting to stack 24EX~~;

~~(uuueeee)~~ One (1) **natural gas fired** grain dryer #1, identified as 16EL4, constructed in 1986, using self-cleaning screens for PM control, and exhausting to stack 16EL;

~~(ffff)~~ One (1) natural gas dryer #1 associated with grain dryer #1, identified as 16EL2, constructed in 1986, and exhausting to stack 16EL;

~~(gggg)~~ One (1) outside conditioner, identified as 17EX1, constructed in 1991, sharing a cyclone with 17EX2 for PM control, and exhausting to stack 17EX; and;

~~(vvvhhh)~~ The following soybean processing equipment, ~~together~~ identified as 17EX2, modified in 1987, ~~sharing~~ **using** a cyclone ~~with 17EX4~~ for PM control, and exhausting to stack 17EX:

(1) One (1) flaking roll #8, constructed in 1981; and

(2) One (1) 'B' flake e/w drag, constructed in 1980.

(www) Two (2) conditioners, identified as 31EX1 and 31EX2, constructed in 2002, and exhausting internally.

Appeal Issue No. 3

Bunge objects to Condition B.22(a) and (e) because it does not reflect the requirement that certain types of monitoring and testing equipment cannot be used in specific areas of the facility during inspections because some locations within this facility are subject to the more stringent OSHA Process Safety regulations. Bunge recommends that this condition be revised to include the phrase "During any reasonable business hours and following the facility safety rules" into the first sentence of B.22(a), and, inserting the phrase "that meets the facility safety requirements," after the word "equipment" in B.22(e).

Response No. 3

IDEM, OAQ addressed this issue during the public notice response period prior to the issuance of the appealed permit. The response to this issue included the following:

"No change was made as a result of this comment as inspections can occur at any time. IDEM, OAQ agrees that inspectors need to follow facility safety rules and use safe equipment. The Permittee can discuss facility safety rules and work with the inspector during the inspection. Based on these discussions with the Permittee, the inspector will then determine what is necessary to perform and accomplish his job."

In addition to this response, as it relates to safety, IDEM, OAQ is required by 326 IAC 2-7-6 to include inspection and entry requirements in the Part 70 Operating Permit. Condition B.22 contains the requirements of 326 IAC 2-7-6(2).

Upon further review of this issue, there have been changes to Condition B.22 based on discussions and agreements between IDEM, OAQ and the Clean Air Strong Economy (CASE) Coalition. Although IDEM, OAQ still does not agree to the specific request of the appeal issue for the reasons stated above, Condition B.22 shall be revised as follows:

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1,** Hhave access to and copy any records that must be kept under the conditions of this permit;
- (c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1,** Hinspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1,** Ssample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1,** Utilize any photographic, recording, testing, monitoring, or other equipment that meets the facility safety requirements, for the purpose of assuring compliance with this permit or applicable requirements.

Appeal Issue No. 4

Bunge states they object to Conditions C.11 and C.19 because they require "all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance." Bunge objects to several of these new "monitoring and record keeping requirements" in Section D and thus does not wish to institute costly and unnecessary requirements that will likely be revised by this appeal. Bunge recommends inserting the phrase "resolution of the permit appeal or issuance of a Joint Stay Agreement whichever is earlier" after the word "of" and deleting the word "permit" from the first paragraph of C.11 and inserting the phrase "resolution of the permit appeal or issuance of a Joint Stay Agreement, whichever is earlier" after the word "of" and deleting the words "permit issuance" of C.19(b).

Response No. 4

Upon further review of this issue, there have been changes to Condition C.19 based on discussions and agreements between IDEM, OAQ and the Clean Air Strong Economy (CASE) Coalition.

However, these agreements do not resolve the petitioner's issue. The petitioner's request will not be incorporated because all changes to permit conditions, including compliance requirements, of the issued permit, resulting from this petition, will be reflected in this permit modification. Although IDEM, OAQ does not agree to the specific request of the appeal issue for the reasons stated above, Condition C.19 shall be revised as follows:

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required **monitoring** data, reports and support information **required by this permit** 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~~ **physically present or electronically accessible** 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) ...

Appeal Issue No. 5

Bunge objects to Condition D.1.2 because it inaccurately applies New Source Performance Standards for Grain Elevators to certain units at the facility, specifically units 10EL1 and 1EL1. Bunge also objected to Condition D.1.4 because IDEM has incorrectly omitted from the Condition units 1EL1 and 10EL1 that are subject to 326 IAC 6-3-2 because these units are not subject to NSPS.

Response No. 5

On March 17, 2004, the petitioner withdrew the objection to the NSPS applicability in regards to Conditions D.1.2 and D.1.4. Therefore, there will be no change to these Conditions.

Appeal Issue No. 6

Bunge objects to the visible emissions notations requirements of Conditions D.1.7, D.2.5, D.3.7 and D.5.7. Bunge objects to these conditions because Bunge claims that each condition contains confusing and burdensome requirements regarding monitoring during shifts that overlap "daylight hours." The Permit requires visible emission notations "once/daylight shift." As it is unlikely that excess emissions are more likely to occur on days with more daylight hours, in order to avoid confusion during different times of the year and to be consistent with other Part 70 permits issued by IDEM, Bunge recommends that each condition be revised from once per shift to once per day.

Response No. 6

Visible Emission (VE) notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6. This requirement is designed as a trigger that the source performs some corrective action on the facility if visible emissions are abnormal and to ensure continuous compliance with emission limitations. IDEM, OAQ has determined for the units 13EX, 14EX and 23EX, as listed in D.2.5(a), that it is reasonable to require once per shift VE notations because emissions from these types of units have the potential of greater variability than those units which require VE's only once per day. IDEM, OAQ has determined that for some specific units, as revised in Conditions D.1.7(a), D.2.5(b) and D.5.7(a), VE notations on a daily, instead of per shift, basis will ensure continuous compliance with the applicable requirements.

Condition D.1.7(a) will be revised to once per day VE notations for Units 1EL1, 2EL1, 5EL1, 10EL1, 14EL1, 19EL1 vent and 20EL1.

Condition D.2.5(b) will be revised to once per day VE notations for stacks 6EL, 9EL, 12EL, 13EL, 15EL, 17EL vent, 103EO, 4SP, 1EX, 3EX, 4EX, 5EX, 6EX, 7EX, 8EX, 9EX, 10EX, 11EX, 12EX, 21EX A, 21EX B, 25EX, 27EX, 29EX, and 30EX. Stacks 13EX, 14EX and 23EX as listed in D.2.5(a), shall remain once per shift. For unit 5SP1, exhausting from stack 5SP, the petitioner has notified IDEM, OAQ that this unit has been removed.

For Condition D.2.5 the petitioner provided the following justification as to why stack 3EL, 4EL and 3EX should be deleted from Condition D.2.5(a).

"Note to IDEM: 3EL and 4EL are not even on the facility's emission inventory because their emissions are very low (less than 5 pounds per hour) and therefore VE notations should not be required. 3EX is a cyclone and should be deleted from this condition."

IDEM, OAQ has no objection to the request for 3EL and 4EL. For stack 3EX, IDEM, OAQ does not agree with the petitioner's statement that cyclones should be deleted from visible emissions requirements. Because of the level of emissions from stack 3EX, VE's are necessary to indicate compliance regardless of what type of control device is used. However, these emissions are not a large portion of the total source emissions. Therefore, the frequency of VE notations for stack 3EX will be revised from once per shift to once per day.

There will be no changes to the frequency of VE notations required by Condition D.3.7. Based on the potential for greater variability of emissions from these units, IDEM, OAQ has determined that this is necessary to ensure continuous compliance.

Condition D.5.7(a) will be revised to once per day VE notations for stacks 16EL and 17EX.

Conditions D.1.7, D.2.5, and D.5.7 have been revised to clarify the failure to take the appropriate response steps shall be considered a "deviation from", instead of a "violation of", the permit.

The changes are as follows:

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Visible Emissions Notations

- (a) Once per ~~day shift~~ **day** visible emission notations of Unit 1EL1, 2EL1, 5EL1, 10EL1, 14EL1, 19EL1 **vent** and 20EL1 stack exhaust shall be performed 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 these processes 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~~ **deviation from** this permit.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Once per shift visible emission notations of ~~3EL, 4EL, 6EL, 9EL, 12EL, 13EL, 15EL, 17EL, 103EO, 4SP, 5SP, 1EX, 3EX, 4EX, 5EX, 6EX, 7EX, 9EX, 10EX, 11EX, 12EX, 13EX, 14EX, 21EX-A, 21EX-B, and 23EX, 25EX, 8EX, 27EX, 29EX, and 30EX~~ stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) **Once per day visible emission notations of 6EL, 9EL, 12EL, 13EL, 15EL, 17EL vent 103EO, 4SP, 1EX, 3EX, 4EX, 5EX, 6EX, 7EX, 8EX, 9EX, 10EX, 11EX, 12EX, 21EX A, 21EX B, 25EX, 27EX, 29EX and 30EX stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.**
- (~~b~~c) 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.

- (ed) 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.
- (de) 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.
- (ef) The Compliance Response Plan for these processes 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~~ **deviation from** this permit.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.7 Visible Emissions Notations

- (a) Once per ~~shift~~ **day** visible emission notations of unit 16EL and 17EX stack exhaust shall be performed 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 these processes 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 **deviation from** ~~violation of~~ this permit.

Appeal Issue No. 7

For Condition D.1.7(a), Bunge also objects to the inclusion of unit 19EL1, because 19EL1 has no stack and therefore there is no way to visibly note "stack" exhaust from this unit.

Response No. 7

On the November 3, 2004 the petitioner further clarified that unit 19EL1 exhaust from a vent and not a stack and withdrew the objection to Condition D.1.7(a). Please see response No. 6 for changes to Condition D.1.7(a).

Appeal Issue No. 8

Bunge objects to Conditions D.1.8 and D.2.6 for three reasons. The reasons are as follows:

- 1- The Conditions contain burdensome requirements regarding daily pressure drop monitoring which do not enhance a source's ability to quickly address environmental problems associated with baghouses. Bunge believes that the daily visible emission monitoring requirements are adequately protective and will likely reveal potential problems faster than pressure drop deviations. Pressure drop deviations are normally better predictors of long term trends in baghouse performance and therefore weekly monitoring will adequately protect the environment.
- 2- These Conditions contain an unacceptable pressure drop range of 3.0 to 6.0 inches. Bunge believes this range is not reflective of its operations; the range should be as initially proposed in the draft permit. i.e., 0.25 inches to 12 inches.
- 3- The requirements to calibrate the instruments on a 6 (six) month basis is overly burdensome; annual calibrations are protective of the environment. Bunge recommends that these Conditions be revised as requested.

Additionally, Bunge objects that Condition D.2.6 includes requirements to conduct parametric monitoring of units that are below the threshold for monitoring established by IDEM guidance. Bunge recommends that this Condition be revised to strike references to 6EL, 13EL, 103EO, 4SP, 5SP, 9EX, 10EX, 11EX, 12EX, 25EX, 29EX, and 30EX.

Response No. 8

These issues were submitted during the public comment period of the appealed permit before it was issued. IDEM, OAQ responded as follows relating to Parametric Monitoring:

"Monitoring of the static pressure drop can alert the operator to relative changes (such as dust cake resistance) over a period of time. The operator can use this information to chart trends and determine if the unit is operating within the optimal range as determined by baseline testing of the unit and manufacturer's specifications. Pressure drop is an indicator of a variety of conditions within the baghouse. Any deviations from the normal operational range of the unit, whether gradual or sudden, should alert the operator that the unit needs maintenance. The Compliance Response Plan should include response steps to anticipate corrective actions when abnormal conditions arise. Both gradual and sudden changes in the pressure drop could result in damage to the bags or baghouse if not properly addressed."

IDEM, OAQ responded as follows to Condition D.2.6 relating parametric monitoring applicability:

"The OAQ believes that it is reasonable to require compliance monitoring for the following units that rely on a baghouse to comply with allowable emissions at the level of: 6EL, 9EL, 12EL, 13EL, 15EL, 103EO, 4SP, 5SP, 1EX, 3EX, 4EX, 5EX, 6EX, 7EX, 9EX, 10EX, 11EX, 12EX, 25EX, 29EX, and 30EX. This is consistent with IDEM guidance." The stacks 6EL, 13EL, 103EO, 4SP, 5SP, 9EX, 10EX, 11EX, 12EX, 25EX, 29EX, and 30EX are included in the response and were determined to meet the requirements to be subject to parametric monitoring.

In order to address the current appeal, Condition D.2.6(a) has been added based on discussions between IDEM, OAQ and the petitioner, requesting revisions of permit terms for consistency in this modification as well as with the petitioner's Part 70 Operating Permit T145-9004-00035, for the Morristown facility.

Based upon further review of the information submitted by the petitioner, the pressure drop ranges will be revised from "3.0 and 6.0" to "0.5 to 8.0". In Conditions D.1.8 and D.2.6 all of the pressure drop recordings were revised from once per shift to once per day. For unit 5SP1, exhausting from stack 5SP, the petitioner has notified IDEM, OAQ that this unit has been removed. For stack 3EX, all units exhausting to this stack share a cyclone and do not have pressure drop readings.

Conditions D.1.8 and D.2.6 have been revised to clarify the failure to take the appropriate response steps shall be considered a "deviation from", instead of a "violation of", the permit.

On March 17, 2004, the petitioner withdrew the objection to calibration, every six (6) months, of the instrument used to determine pressure. The phrase "or at a frequency recommended by the manufacturer" is being added to Condition D.1.8 for consistent permit Parametric Monitoring language.

The changes are as follows:

D.1.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with 1EL1, 2EL1, 5EL1, 10EL1, 14EL1, and 20EL1 at least once per ~~shift~~ **day** when the processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the normal range of ~~3-0.5 to and 68.0~~ 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 - Preparation, Implementation, Records, and Reports. 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~~ **deviation from** 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: **or at a frequency recommended by the manufacturer.**

D.2.6 Parametric Monitoring

- (a) **Alarms shall be operational on all cyclone high level indicators. If an alarm sounds, the Permittee shall take reasonable response steps. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**
- (b) The Permittee shall record the total static pressure drop across the baghouses and filters controlling 6EL, 9EL, 12EL, 13EL, 15EL, 103EO, 4SP, ~~5SP~~, 1EX, ~~3EX~~, 4EX, 5EX, 6EX, 7EX, 9EX, 10EX, 11EX, 12EX, 25EX, 29EX and 30EX at least once per ~~shift~~ **day** when the processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the normal range of ~~3-0.5 to and 68.0~~ 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 - Preparation, Implementation, Records, and Reports. 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~~ **deviation from** this permit.

Appeal Issue No. 9

Bunge objects to Conditions D.1.11, D.2.11, D.3.8 and D.5.12 because they impose inconsistent record keeping requirements in light of Bunge's objections to the corresponding visible emission and parametric monitoring requirements set forth above. Bunge recommends that these Conditions be revised to be consistent with the appropriate respective monitoring requirements.

Response No. 9

The record keeping requirements of the issued Part 70 Operating Permit have been revised as follows due to the revision of permit terms in order to resolve all issues related to the appeal. Conditions D.1.11(f), D.2.11(f) and D.5.5(e) have been added based on additional review of permit terms.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records of the amount of soybean grains processed after the grain dryers. This is the same record that is required in Conditions D.2.11(a) and D.5.12(a).
- (b) To document compliance with Condition D.1.7(a), the Permittee shall maintain records of once per ~~day~~ ~~shift~~ visible emission notations of the stack exhaust **from units 1EL1, 2EL1, 5EL1, 10EL1, 14EL1, 20EL1 and vent exhaust from unit 19EL1.**
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain once per ~~shift~~ ~~day~~ records of the total pressure drop across the baghouse during normal operation when venting to the atmosphere.
- (d) To document compliance with Condition D.1.9, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9 and the dates the vents are redirected.
- (e) **To document compliance with Condition D.1.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.**
- (ef) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records of the amount of soybean grains processed after the grain dryers. This records is the same record that is required in Conditions D.1.11(a) and D.5.12(a).
- (b) To document compliance with Condition D.2.5(a), the Permittee shall maintain records of once per shift visible emission notations of the stack exhaust.
- (c) **To document compliance with Condition D.2.5(b), the Permittee shall maintain records of once per day visible emission notations of the stack exhaust and 17EL vent exhaust.**
- (ed) To document compliance with Condition D.2.6, the Permittee shall maintain once per ~~shift~~ ~~day~~ records of the total pressure drop across the baghouse during normal operation when venting to the atmosphere. **The Permittee shall also maintain records of any alarms that sound and the response steps taken.**
- (de) To document compliance with Conditions D.2.7 and D.2.9, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.7 and D.2.9 and the dates the vents are redirected.

- (f) To document compliance with D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.**
- (eg)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.12 Record Keeping Requirements

- (a) To document compliance with Condition D.5.3, the Permittee shall maintain records of the amount of soybean grains processed after the grain dryers. This records is the same record that is required in Conditions D.1.11(a) and D.2.11(a).
- (b) To document compliance with Condition D.5.7(a), the Permittee shall maintain records of once per ~~day shift~~ **day** visible emission notations of the stack exhaust **of unit 16EL and 17EX.**
- (c) To document compliance with Conditions D.5.8 and D.5.10, the Permittee shall maintain records of the results of the inspections required under Conditions D.5.8 and D.5.10 and the dates the vents are redirected.
- (d) To document compliance with D.5.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.**
- (de)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Appeal Issue No. 10

Bunge states they object to Condition D.2.5 because it includes requirements to conduct visible emissions monitoring of units that are below the threshold for monitoring established by IDEM guidance. Bunge recommends that this Conditions be revised to change VE notation requirements from once per shift to once per day and strike VE notation requirements of stacks identified as 3EL, 4EL, 6EL, 13EL, 17EL, 103EO, 4SP, 5SP, 9EX, 10EX, 11EX, 12EX, 23EX, 25EX, 8EX, 27EX, 29EX, and 30EX.

Response No. 10

This issue was submitted during the public comment period of the appealed permit before it was issued. IDEM, OAQ responded as follows:

“The OAQ believes that it is reasonable to require compliance monitoring for the following units that rely on control devices to comply with allowable emissions at the level of: 3EL, 4EL, 6EL, 9EL, 12EL, 13EL, 15EL, 17EL, 103EO, 4SP, 5SP, 1EX, 3EX, 4EX, 5EX, 6EX, 7EX, 9EX, 10EX, 11EX, 12EX, 13EX, 14EX, 21EX-A, 21EX-B, 23EX, 25EX, 8EX, 27EX, 29EX, and 30EX. Visible emissions notations are not required for the following controlled units because they have allowable emissions pursuant to 326 IAC 6-3-2 that are low: 204RO, 102EO, 1EF, and 2EF. Visible emissions notations are not required for the following units because they have no control device and have low actual emissions: 7EL, 2EX, 3EF, 4EF, 5EF, 16EX, and 18EX.”

This response illustrates that IDEM, OAQ reviewed and determined which units would be required to have VE notations. Each of these stacks as identified have some type of control in place to reduce emissions. Please see Response No. 6 for revisions to Condition D.2.5.

Appeal Issue No. 11

Bunge states they object to Condition D.3.9 because it is confusing and imposes burdensome reporting and certification requirements. Boiler units 105E01, 106E01 and 108E01 are only capable of combusting natural gas. Units 1SP1 and 2SP1 only burn coal. Unit 3SP1 is capable of burning natural gas and waste oils/solvents Bunge recommends that this Condition be revised to completely strike D.3.9(a) and (b).

Response No. 11

IDEM, OAQ received a letter from the petitioner on November 15, 2004 titled "Certification of Natural Gas Only Fired Boilers for Bunge North America Part 70 Operating Permit No. T001-5610-00005". This letter was submitted based on a request for additional information during the October 18, 2004 relating to resolving this issue. IDEM, OAQ has accepted this letter as a signed certification that these units burn Natural Gas only and will remove the references to reporting requirements for units 106E01, now 110EO, and 108E01 from D.3.9(a). Unit 105E01 will be stricken from D.3.9(a) based on additional information that this unit has been removed from the facility.

Unit 1SP1 and 2SP1 only burn coal and have reporting requirements in D.3.9(c), so the reference to these units will be stricken from D.3.9(a).

Unit 3SP1 can burn natural gas, vegetable oil, waste oil and hazardous chemicals. The D.3.9(a) reporting requirements apply to unit 3SP1 based on the petitioner needs to report occurrences when burning Natural Gas so IDEM, OAQ can verify why VE's are not performed. The petitioner is required to perform VE's when burning vegetable oil, waste oil or hazardous chemicals, based on this requirement, Condition D.3.9(b) will not be deleted.

Conditions D.3.7(e) has been revised to clarify the failure to take the appropriate response steps shall be considered a "deviation from", instead of a "violation of", the permit.

The following modifications will be made to Condition D.3.7 and D.3.9 based upon the additional information submitted by the petitioner:

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Visible Emissions Notations

- (a) Once per shift visible emission notations of 1SP stack exhaust shall be performed during normal daylight operations when combusting coal, **vegetable oil, waste oil or solvents** and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) ...
- (e) The Compliance Response Plan for these processes 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 **deviation from violation** of this permit.

D.3.9 Reporting Requirements

- (a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period for units ~~105E01, 106E01, 108E01, 1SP1, 2SP1, and~~ 3SP1. The natural gas-fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34);

Appeal Issue No. 12

Bunge objects to Condition D.4.8. Bunge claims, based upon review of the construction dates of the units listed in Section D.4, that testing should not be required. Bunge recommends that this condition be deleted.

Response No. 12

Bunge submitted information on April 26, 2005 to support why the testing requirement should be removed from the permit. Based upon the April 26, 2005 submittal IDEM, OAQ has determined that the units in Section D.4 are not subject to 326 IAC 8-1-6 BACT because the units were either built prior to January 1, 1980 or, for units built after this date, they did not have potential emissions of 25 tons or more per year.

Based on this determination conditions D.4.1 and D.4.8 will be deleted. Section D.4 will be revised as follows:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

~~D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]~~

~~Pursuant to CP(002)2005, issued August 23, 1991, and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the VOC emissions from the hexane emitting units shall be controlled by a mineral oil absorption system with a control efficiency of 99.9%.~~

D.4.12 PSD Limit [326 IAC 2-2][40CFR 52.21]

Pursuant to CP(002)2005, issued August 23, 1991, the hexane usage for all of the oil extraction facilities (24EX1-24EX11) combined shall be limited to less than 330,000 gallons per twelve (12) consecutive month period to ensure that the increase in hexane emissions from these units remains below 39.2 tons per year. This will ensure that 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 does not apply to this modification.

D.4.23 Storage Vessels [40 CFR 60, Subpart Kb][326 IAC 12]

Pursuant...

Compliance Determination Requirements

D.4.67 Volatile Organic Compounds (VOC)

In order to comply with Conditions D.4.1 and D.4.2, the mineral oil absorber for VOC control shall be in operation and control emissions from the listed facilities at all times when the facilities are in operation.

~~D.4.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]~~

~~During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Conditions D.4.1, the Permittee shall perform VOC testing for the mineral absorption system to demonstrate compliance with the 99.9% control efficiency utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.~~

D.4.79 Compliance Requirements [40 CFR Part 63, Subpart GGGG]

(a) ...

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.4.102~~ Monitoring

- (a) To document compliance with Conditions ~~D.4.1 and D.4.2~~, the mineral oil absorption vent VOC (hexane) emission rate shall be determined daily by measuring the airflow rate and the concentration of hexane in the air stream. This concentration will be determined daily by measuring percent Lower Explosive Limit (LEL). If the air flow meter proves unreliable, airflow can be determined by calculations.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.4.113~~ Record Keeping Requirements

- ~~(a) To document compliance with Condition D.4.1 and D.4.12, the Permittee shall maintain records of the mineral oil absorption vent VOC (hexane) emission rate as determined according to Condition D.4.12;~~
- (ab) To document compliance with Condition D.4.12, the Permittee shall maintain records of the hexane usage for the oil extraction facilities.
- (be) To document compliance with Condition D.4.23, the Permittee shall maintain a record showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
- (cd) To document compliance with Condition D.4.45 and 40 CFR Part 63, Subpart GGGG, the Permittee shall comply with the following:
 - (1) ...
- (de) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.124 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.4.12 shall be submitted to the address 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) ...

Appeal Issue No. 13

Bunge objects to Condition D.5.7 because it includes unit (16EL) that is below the threshold for monitoring established by IDEM guidance. Bunge recommends that this Condition be revised to strike the reference to unit 16EL and change the Visible Emissions Notations from once per shift to once per day.

Response No. 13

This issue was submitted during the public comment period of the appealed permit before it was issued. IDEM, OAQ responded as follows:

“The OAQ believes that it is reasonable to require compliance monitoring for the following units that rely on control devices to comply with allowable emissions at the level of: 16EL and 17EX. This is consistent with IDEM guidance.”

On November 3, 2004, the petitioner withdrew the objection to VE notations of 16EL. Please see response No. 6 for changes to Condition D.5.7(a).

Appeal Issue No. 14

Bunge objects to the inclusion of the following statement in the Technical Support Document “TSD” of the issued Part 70 Operating Permit T001-5610-00005:

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. If these units had been constructed under current regulations, they would have been considered significant source modifications under 326 IAC 2-7-10.5 because their uncontrolled potential to emit PM is greater than twenty-five (25) tons per year. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

because the statement is inaccurate and wholly without support in the law. On January 23, 2002 IDEM sent Bunge a letter granting limited liability for certain units at the facility pursuant to Ind. Code (IC) 13-17-7. Bunge provided IDEM with an executed Acknowledgement Letter on January 30, 2002.

Response No. 14

On November 3, 2004, the petitioner submitted the following statement:

“NOTE TO IDEM: Bunge requests that the addendum to the TSD include the following statement: On January 23, 2002 IDEM sent Bunge a letter granting limited liability for certain units at the facility pursuant to Ind. Code (IC) 13-17-7. Bunge provided IDEM with an executed Acknowledgement Letter on January 30, 2002.”

IDEM, OAQ can not revise the Addendum to the Technical Support Document or the Technical Support Document of the Part 70 Operating Permit T001-5610-00005 since it was issued on July 3, 2002 and is a final document.

IDEM, OAQ acknowledges that a limited liability letter was mailed to the petitioner on January 23, 2002 and an Acknowledgement Letter was received from the petitioner on January 30, 2002 for units described and identified as one (1) grain dryer #1 16EL1, one natural gas dryer #1 16EL2, one (1) outside conditioner 17EX1 and soybean processing equipment 17EX2. These actions were taken pursuant to the IDEM, OAQ's Compliance transition Program commonly referred to as the limited liability nonrule policy. This policy was published in the April 1, 1996 Indiana Register. Since the petitioner complied with this policy, the violation has been resolved.

Additional Information

Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into your permit as follows:

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

In Condition D.4.14(d)&(e), Reporting Requirements, the word “or” is misspelled as “ro”. The word “ro” will be replaced with the word “or”.

IDEM, OAQ has a new mailing address. The address to submit information to IDEM, OAQ is found throughout the permit. The mailing address will be revised as follows:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46204-6015

The contact information regarding the annual fee payment has changed. Condition B.24 will be revised as follows:

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) ...
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 **4230** (ask for OAQ, ~~Technical Support and Modeling~~ **Billing, Licensing and Training** Section), to determine the appropriate permit fee.

Conditions D.1.10, D.2.8, D.2.10, D.5.9 and D.5.11 have been revised to clarify the failure to take the appropriate response steps shall be considered a “deviation from”, instead of a “violation of”, the permit. The changes are as follows:

D.1.10 Broken or Failed Bag or Screen 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 **deviation from** ~~violation~~ of this permit.

D.2.8 Broken or Failed Bag, Filter, or Screen Detection

In the event that bag or screen 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~~ **deviation from** this permit.

D.2.10 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. 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

D.5.9 Broken or Failed Screen 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~~ **deviation from** this permit.

D.5.11 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. 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a **deviation from** ~~violation of~~ this permit.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the petition for administrative review and additional information submitted on March 17, 2004 and November 3, 2004 and April 26, 2005 by the applicant.

Enforcement Issue

There are no enforcement actions pending.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM-10	349
SO ₂	498
VOC	407
CO	132
NO _x	276
Lead	0.17

County Attainment Status

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Adams County has been designated as attainment for the 8-hour ozone standard.

The source is located in Adams County.

Pollutant	Status
PM-10	attainment
PM-2.5	attainment
SO ₂	attainment
NO ₂	attainment
1-hour Ozone	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Adams County has been classified as attainment for PM_{2.5} (effective April 5, 2005). U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. Therefore, these proposed increases in particulate matter emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Adams County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Adams County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
Since this type of operation is not one of the 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 emissions are not counted toward determination of PSD and Emission Offset applicability.

Conclusion

The operation of this grain handling, animal feed production, soybean meal production, and soybean oil extraction plant shall be subject to the conditions of this Part 70 Significant Permit Modification 001-16018-00005.