

April 15, 2004

Wendall Carroll  
ADM Grain Company  
1901 South Sherman Drive  
Indianapolis, Indiana 46204

Re: 097-18861-00028 Notice-only change to 097-7963-00028

Dear Wendall Carroll:

ADM Grain Company was issued a Minor Source Operating Permit (MSOP) on December 29, 2003 for the operation of a stationary grain operator, located at 1901 South Sherman Drive, Indianapolis, Indiana 46204. A letter notifying the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) of the addition of a baghouse, identified as Baghouse #9 to control emissions from 57 house and North Rail Loadout was received on March 19, 2004. The bold language is new language that has been added, and the language with a line through it has been taken out. These are only being used in this letter to emphasize the changes made. Pursuant to the provisions of 326 IAC 2-6.1-6 (d) (5) the MSOP is hereby revised as follows:

1. Section A.2 (f), Emissions Units and Pollution Control Equipment Summary, and Section D.2(c) will be changed to reflect the use of Baghouse #9 as control for the North Rail Loadout. The permit is amended as follows:

One (1) rail loadout, identified as North, installed in 1957 and 1958, and upgraded in 1988, with maximum capacity of 1100 tons per hour, using ~~no control~~ **a baghouse, identified as Baghouse #9, as particulate control**, and exhausting to the atmosphere.

2. Section A.2 (m), Emissions Units and Pollution Control Equipment Summary, and Section D.2 (j), Facility Description, will be changed to reflect the use of Baghouse #9 as particulate control for the Internal transfer operations, serving the "57 House".

Internal transfer operations, serving the "57 House", installed in 1957 and 1958, with a maximum capacity of 336 tons per hour, using ~~a baghouses~~, identified as Baghouse #7 **and Baghouse #9**, as particulate control, and exhausting to stack 7.

3. Conditions D.2.2, D.2.3, D.2.4, and D.2.7 will also be changed to reflect the use of Baghouse #9 as follows:

#### D.2.2 Particulate Control

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In order to comply with D.2.1, the baghouses, identified as Baghouse #1, Baghouse #6, Baghouse #7, ~~and Baghouse #8~~, **and Baghouse #9** for particulate control shall be in operation and control emissions from the affected facilities at all times these facilities are in operation.

## Compliance Monitoring Requirements

### D.2.3 Visible Emissions Notations

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- (a) Visible emission notations of the stack exhausts for Baghouse #1, Baghouse #6, Baghouse #7, ~~and~~ Baghouse #8, **and Baghouse #9** shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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### D.2.4 Parametric Monitoring

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The Permittee shall record the total static pressure drop across Baghouse #1, Baghouse #6, Baghouse #7, ~~and~~ Baghouse #8, **and Baghouse #9** used in conjunction with the affected facilities, at least once per shift when the affected facilities are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

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

### D.2.7 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of visible emission notations of the stack exhausts for Baghouse #1, Baghouse #6, Baghouse #7, ~~and~~ Baghouse #8, **and Baghouse #9** once per shift.

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All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Angelique Oligier, (317) 327-2846.

Sincerely,

Original Signed by John B. Chavez  
John B. Chavez  
Administrator

Attachment: MSOP affected pages

aco

cc: File - Marion County  
Air Compliance, Matt Mosier  
IDEM, Mindy Hahn  
Permits, Angelique Oligier

**MINOR SOURCE OPERATING PERMIT**

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

**ADM Grain Company  
1901 South Sherman Drive  
Indianapolis, Indiana 46204**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1 if new source, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-7963-00028	
Issued by: <b>ORIGINALLY SIGNED BY</b> John B. Chavez, Administrator City of Indianapolis, Office of Environmental Services	Issuance Date: December 29, 2003  Expiration Date: December 29, 2008
Notice Only Change: 097-18613-00028	
Pages Affected: 1, 5, and 19	
Issued by: <b>ORIGINALLY SIGNED BY</b> John B. Chavez, Administrator City of Indianapolis, Office of Environmental Services	Issuance Date: January 27, 2004
Notice Only Change: 097-18861-00028	
Pages Affected: 1, 5, 19, 21, 22, and 23	
Issued by:  Original Signed By:  John B. Chavez, Administrator City of Indianapolis, Office of Environmental Services	Issuance Date: April 15, 2004

- (f) One (1) rail loadout, identified as North, installed in 1957 and 1958, and upgraded in 1988, with maximum capacity of 1100 tons per hour, using a baghouse, identified as Baghouse #9, as particulate control, and exhausting to the atmosphere.
- (g) Two (2) rail receiving operations, identified as North and South, installed in 1957 and 1958, each with a maximum capacity of 270 tons per hour. The North rail receiving operation uses no control and exhausts to the atmosphere, and the South rail receiving operation uses a baghouse, identified as Baghouse #5, as particulate control, and exhausts to stack 5.
- (h) Internal transfer operations, serving the "65 House", installed in 1965 and 1966, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (i) Fourteen (14) truck loadout spouts, serving the "65 house", installed in 1965 and 1966, each with a maximum capacity of 280 tons per hour, using no control, and exhausting to the atmosphere.
- (j) Two (2) shipping legs, identified as Leg 7, Leg 8, installed in 1965 and 1966, serving the "65 House", each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (k) One (1) shipping leg, identified as Leg C1, installed in 1977, serving the "65 House", with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (l) Internal transfer operations, serving the "77 House", installed in 1977, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #1, as particulate control, and exhausting to stack 1.
- (m) Internal transfer operations, serving the "57 House", installed in 1957 and 1958, with a maximum capacity of 336 tons per hour, using baghouses, identified as Baghouse #7 and Baghouse #9, as particulate control, and exhausting to stack 7.
- (n) Five (5) shipping legs, installed in 1957 and 1958, serving the "57 House", identified as Legs 1 through 5, each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (o) One (1) shipping legs, installed in 1977, serving the "57 House", identified as F1 Jack Leg, with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (p) Unpaved and paved roads with public access.

**SECTION D.2 FACILITY OPERATION CONDITIONS**

**Facility Description :**

- (a) One (1) twin truck dump, with a maximum capacity of 350 tons per hour, installed in 1965 and 1966, using a baghouse, identified as Baghouse #8, as particulate control, and exhausting to stack 8.
- (b) One (1) rail loadout, identified as South, installed in 1957 and 1958, with maximum capacity of 336 tons per hour, using no control, and exhausting to the atmosphere.
- (c) One (1) rail loadout, identified as North, installed in 1957 and 1958, and upgraded in 1988, with maximum capacity of 1100 tons per hour, using a baghouse, identified as Baghouse #9, as particulate control, and exhausting to the atmosphere.
- (d) Two (2) rail receiving operations, identified as North and South, installed in 1957 and 1958, each with a maximum capacity of 270 tons per hour. The North rail receiving operation uses no control and exhausts to the atmosphere, and the South rail receiving operation uses a baghouse, identified as Baghouse #5, as particulate control, and exhausts to stack 5.
- (e) Internal transfer operations, serving the "65 House", installed in 1965 and 1966, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (f) Fourteen (14) truck loadout spouts, serving the "65 house", installed in 1965 and 1966, each with a maximum capacity of 280 tons per hour, using no control, and exhausting to the atmosphere.
- (g) Two (2) shipping legs, identified as Leg 7, Leg 8, installed in 1965 and 1966, serving the "6 House", each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (h) One (1) shipping leg, identified as Leg C1, installed in 1977, serving the "65 House", with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (i) Internal transfer operations, serving the "77 House", installed in 1977, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #1, as particulate control, and exhausting to stack 1.
- (j) Internal transfer operations, serving the "57 House", installed in 1957 and 1958, with a maximum capacity of 336 tons per hour, using baghouses, identified as Baghouse #7 and Baghouse #9, as particulate control, and exhausting to stack 7.
- (k) Five (5) shipping legs, installed in 1957 and 1958, serving the "57 House", identified as Legs 1 through 5, each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (l) One (1) shipping legs, installed in 1977, serving the "57 House", identified as F1 Jack Leg, with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.

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

- and disposed of so that the area does not generate fugitive dust.
- (C) Dust from driveways, access roads, and other areas of travel shall be controlled.
  - (D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
- (2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
- (A) Malfunctions.
  - (B) Breakdowns.
  - (C) Improper adjustment.
  - (D) Operating above the rated or designed capacity.
  - (E) Not following designed operating specifications.
  - (F) Lack of good preventive maintenance care.
  - (G) Lack of critical and proper spare replacement parts on hand.
  - (H) Lack of properly trained and experienced personnel.
- (3) Emissions from the affected areas, operations equipment, and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

### Compliance Determination Requirements

#### D.2.2 Particulate Control

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In order to comply with D.2.1, the baghouses, identified as Baghouse #1, Baghouse #6, Baghouse #7, Baghouse #8, and Baghouse #9 for particulate control shall be in operation and control emissions from the affected facilities at all times these facilities are in operation.

### Compliance Monitoring Requirements

#### D.2.3 Visible Emissions Notations

---

- (a) Visible emission notations of the stack exhausts for as Baghouse #1, Baghouse #6, Baghouse #7, Baghouse #8, and Baghouse #9 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

#### D.2.4 Parametric Monitoring

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The Permittee shall record the total static pressure drop across Baghouse #1, Baghouse #6, Baghouse #7, Baghouse #8, and Baghouse #9 used in conjunction with the affected facilities, at least once per shift when the affected facilities are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

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

#### D.2.5 Baghouse Inspections

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

#### D.2.6 Broken or Failed Bag Detection

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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. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

### **D.2.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of visible emission notations of the stack exhausts for Baghouse #1, Baghouse #6, Baghouse #7, Baghouse #8, and Baghouse #9 once per shift.
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.