



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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Indianapolis, Indiana 46204
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TO: Interested Parties / Applicant
DATE: June 23, 2005
RE: Cargill AgHorizons / 127-20184-00025
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar 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.

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.

Enclosures
FNPER.dot 1/10/05



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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) Renewal
OFFICE OF AIR QUALITY**

**Cargill AgHorizons
6600 Highway 12 – Burns Waterway
Portage, Indiana 46368**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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. 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.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. **This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.**

| | |
|---|--|
| Operation Permit No.: F127-20184-00025 | |
| Original signed by: Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: June 23, 2005 Expiration Date: June 23, 2010 |

TABLE OF CONTENTS

| | | |
|------------------|---|-----------|
| SECTION A | SOURCE SUMMARY | 6 |
| A.1 | General Information [326 IAC 2-8-3(b)] | |
| A.2 | Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)] | |
| A.3 | Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)] | |
| A.4 | FESOP Applicability [326 IAC 2-8-2] | |
| A.5 | Prior Permits Superseded [326 IAC 2-1.1-9.5] | |
| SECTION B | GENERAL CONDITIONS..... | 8 |
| B.1 | Permit No Defense [IC 13] | |
| B.2 | Definitions [326 IAC 2-8-1] | |
| B.3 | Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5] | |
| B.4 | Enforceability [326 IAC 2-8-6] | |
| B.5 | Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)] | |
| B.6 | Severability [326 IAC 2-8-4(4)] | |
| B.7 | Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)] | |
| B.8 | Duty to Provide Information [326 IAC 2-8-4(5)(E)] | |
| B.9 | Compliance Order Issuance [326 IAC 2-8-5(b)] | |
| B.10 | Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)] | |
| B.11 | Annual Compliance Certification [326 IAC 2-8-5(a)(1)] | |
| B.12 | Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)] | |
| B.13 | Emergency Provisions [326 IAC 2-8-12] | |
| B.14 | Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)] | |
| B.15 | Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8] | |
| B.16 | Permit Renewal [326 IAC 2-8-3(h)] | |
| B.17 | Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1] | |
| B.18 | Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1] | |
| B.19 | Permit Revision Requirement [326 IAC 2-8-11.1] | |
| B.20 | Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1] | |
| B.21 | Transfer of Ownership or Operational Control [326 IAC 2-8-10] | |
| B.22 | Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7] | |
| B.23 | Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6] | |
| SECTION C | SOURCE OPERATION CONDITIONS..... | 17 |
| | Emissions Limitations and Standards [326 IAC 2-8-4(1)] | |
| C.1 | Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2] | |
| C.2 | Overall Source Limit [326 IAC 2-8] | |
| C.3 | Opacity [326 IAC 5-1] | |
| C.4 | Open Burning [326 IAC 4-1] [IC 13-17-9] | |
| C.5 | Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)] | |
| C.6 | Fugitive Dust Emissions [326 IAC 6-4] | |
| C.7 | Fugitive Particulate Matter Emission Limitations [326 IAC 6-5] | |
| C.8 | Operation of Equipment [326 IAC 2-8-5(a)(4)] | |
| C.9 | Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M] | |
| | Testing Requirements [326 IAC 2-8-4(3)] | |
| C.10 | Performance Testing [326 IAC 3-6] | |
| | Compliance Requirements [326 IAC 2-1.1-11] | |
| C.11 | Compliance Requirements [326 IAC 2-1.1-11] | |

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

- C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

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

- C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

- C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]
- C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS..... 25

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

- D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]
- D.1.2 New Source Performance Standards (NSPS) for Grain Elevators [326 IAC 12] [40 CFR Part 60, Subpart DD]
- D.1.3 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.5 Particulate Control

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

- D.1.6 Visible Emissions Notations
- D.1.7 Parametric Monitoring
- D.1.8 Baghouse Inspections
- D.1.9 Broken or Failed Bag Detection

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

- D.1.10 Record Keeping Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS..... 28

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

- D.2.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]
- D.2.2 New Source Performance Standards (NSPS) for Grain Elevators [326 IAC 12] [40 CFR Part 60, Subpart DD]
- D.2.3 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]
- D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.2.5 Particulate Control
- D.2.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

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

- D.2.7 Visible Emissions Notations

- D.2.8 Parametric Monitoring
- D.2.9 Baghouse Inspections
- D.2.10 Broken or Failed Bag Detection

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

- D.2.11 Record Keeping Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS..... 31

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

- D.3.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]
- D.3.2 New Source Performance Standards (NSPS) for Grain Elevators [326 IAC 12] [40 CFR Part 60, Subpart DD]
- D.3.3 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]
- D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.3.5 Particulate Control
- D.3.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

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

- D.3.7 Visible Emissions Notations
- D.3.8 Parametric Monitoring
- D.3.9 Baghouse Inspections
- D.3.10 Broken or Failed Bag Detection

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

- D.3.11 Record Keeping Requirements

SECTION D.4 FACILITY OPERATION CONDITIONS..... 34

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

- D.4.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]
- D.4.2 New Source Performance Standards (NSPS) for Grain Elevators [326 IAC 12] [40 CFR Part 60, Subpart DD]
- D.4.3 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]
- D.4.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.4.5 Particulate Control
- D.4.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

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

- D.4.7 Visible Emissions Notations
- D.4.8 Parametric Monitoring
- D.4.9 Baghouse Inspections
- D.4.10 Broken or Failed Bag Detection

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

- D.4.11 Record Keeping Requirements

SECTION D.5 FACILITY OPERATION CONDITIONS..... 37

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

- D.5.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]
- D.5.2 New Source Performance Standards (NSPS) for Grain Elevators [326 IAC 12] [40 CFR Part 60, Subpart DD]
- D.5.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.5.4 Particulate Control

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

D.5.5 Record Keeping Requirements

SECTION D.6 FACILITY OPERATION CONDITIONS..... 38

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

D.6.1 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]

D.6.2 Particulate [326 IAC 6-3-2]

D.6.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.6.4 Particulate Control

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

D.6.5 Visible Emissions Notations

D.6.6 Self Cleaning Screens Inspections

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

D.6.7 Record Keeping Requirements

D.6.8 Reporting Requirements

SECTION D.7 FACILITY OPERATION CONDITIONS..... 40

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

D.7.1 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

CERTIFICATION 41

EMERGENCY OCCURRENCE REPORT 42

FESOP QUARTERLY REPORT 44

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT 45

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 2-8-3(b)]

The Permittee owns and operates a stationary grain elevator

| | |
|-------------------------|---|
| Authorized individual: | Burns Harbor Farm Service Center Manager |
| Source Address: | 6600 Highway 12 – Burns Waterway, Portage, IN 46368 |
| Mailing Address: | 6640 Ship Drive, Port of Indiana, Portage, IN 46368 |
| General Source Phone: | 219-787-5704 |
| SIC Code: | 5153 |
| Source Location Status: | Porter |
| | Nonattainment for ozone under both one hour and eight hour standards and for PM-2.5 |
| | Attainment for all other criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit (FESOP) |
| | Minor Source, under PSD and Emission Offset Rules |
| | Minor Source, Section 112 of the Clean Air Act |

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

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

- (a) Two (2) truck dumps, one (1) rail car dump, and one (1) rail loadout, all identified as System #1, controlled by baghouse DS61, rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 61.
- (b) Leg intakes (#L-30, L-31, L-33, L-34 & L-35), conveyor intake (#BC-226), conveyor intake & discharge (#BC-204), conveyor intake (#BC-225), discharge (#BC-205), and conveyor intake (#BC-203), all identified as System #2, controlled by baghouse DS62 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 62.
- (c) Leg elevator intake (#L-32), distributor heads (#TH-1, TH-3, TH-8 & TH-9), two (2) enclosed screw conveyors, which distribute the product into two (2) 18,000-bushel bins (#BC-211 and BC-212), conveyors to silo (#BC-208 & #BC-209), conveyor to steel bin (#BC-213), three (3) surge hoppers, and weigh hopper (#S-14), all identified as System #3, controlled by baghouse DS63 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 63.
- (d) The Peco loading system and ship loading, all identified as System #4, controlled by baghouse DS65 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 65.
- (e) Pneumatic dust handling system, identified as System #5, controlled by baghouse DS64 rated at 99.99% efficiency. The baghouse exhaust is re-circulated into the dust handling system.
- (f) Two (2) natural gas fired grain dryers, DR41 and DR43, each equipped with an integral self-cleaning screen with 61 mesh size and rated at 40 million BTU per hour, installed in May 1981, exhausted through Stack DR41/43.

- (g) One (1) open-grain storage pile, with a maximum capacity of 750,000 bushels.

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

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

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

Eight (8) space heaters with a combined heat input of one and two tenths (1.2) million Btu per hour.

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

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

A.5 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) deleted

by this permit.

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

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

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

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

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

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

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

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

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (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 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

and

Telephone No.: 1-888-209-8892 or,
Telephone No.: 219-757-0265
Facsimile No.: 219-757-0267

- (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 2-8-4(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance 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 does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, 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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, 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 until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ 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 needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

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

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

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

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue,
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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]

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 FESOP 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, at reasonable times, 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 at reasonable times, 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, at reasonable times, 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

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

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [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

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on June 30, 1999. The plan consists of enclosing loading and unloading operations, enclosing grain transfer operations, and utilizing open grain storage only in overflow situations.

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

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue,
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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.10 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee 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.11 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

C.13 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.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(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) 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in 40CFR 68 is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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 is comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan, or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen into the ambient air equal to or greater than twenty – five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

The 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

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 2-8-4(10)]: System #1

Two (2) truck dumps, one (1) rail car dump, and one (1) rail loadout, all identified as System #1, controlled by baghouse DS61, rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 61.

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

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

D.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 units in this section except when otherwise specified in 40 CFR Part 60, Subpart DD.

D.1.2 New Source Performance Standards (NSPS) for Grain Elevators [326 IAC 12] [40 CFR Part 60, Subpart DD]

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.302, Subpart DD) Standards of Performance for Grain Elevators@:

- (a) fugitive emissions from truck unloading operations shall be limited to 5% opacity.
- (b) fugitive emissions from railcar unloading operations shall be limited to 5% opacity.
- (c) fugitive emissions from railcar loading operations shall be limited to 5% opacity.
- (d) nonfugitive emissions shall be limited to 0.01 grain per dry cubic feet at standard conditions (gr/dscf) and 0% opacity.

D.1.3 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to SPR 127-16957-00025, issued June 19, 2003:

- (a) The PM emissions from System #1 exhausted through Stack DS 61 shall not exceed 3.60 pounds of PM per hour.
- (b) The PM₁₀ emissions from System #1 exhausted through Stack DS 61 shall not exceed 3.60 pounds of PM₁₀ per hour.

Compliance with these PM and PM₁₀ emission limitations combined with those specified in Conditions D.2.3, D.3.3, D.4.3, and D.6.1 renders the requirements of 326 IAC 2-2 not applicable and also satisfies the requirements of 326 IAC 2-8-4 for PM₁₀.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.5 Particulate Control

In order to comply with conditions D.1.2 and D.1.3, the baghouse DS61 for particulate control shall be in operation and control emissions from System #1 at all times that any part of System #1 is in operation.

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

D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of the System #1 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 this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with System #1, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 5.0 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.

D.1.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling System #1. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. 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. 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 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

- (a) To document compliance with condition D.1.6, the Permittee shall maintain records of visible emission notations of the System #1 stack exhaust once per day.
- (b) To document compliance with condition D.1.7, the Permittee shall maintain records once per day of the total static pressure drop.
- (c) To document compliance with condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.
- (d) To document compliance with condition D.1.4, 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.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Leg intakes (#L-30, L-31, L-33, L-34 & L-35), conveyor intake (#BC-226), conveyor intake & discharge (#BC-204), conveyor intake (#BC-225), discharge (#BC-205), and conveyor intake (#BC-203), all identified as System #2, controlled by baghouse DS62 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 62.

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

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

D.2.1 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 units in this section except when otherwise specified in 40 CFR Part 60, Subpart DD.

D.2.2 New Source Performance Standards (NSPS) for Grain Elevators [326 IAC 12] [40 CFR Part 60, Subpart DD]

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.302, Subpart DD)
A Standards of Performance for Grain Elevators:Ⓜ

- (a) emissions shall be limited to 0.01 grain per dry cubic feet at standard conditions (gr/dscf) and 0% opacity.

D.2.3 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to SPR 127-16957-00025, issued June 19, 2003:

- (a) The PM emissions from System #2 exhausted through Stack DS 62 shall not exceed 2.40 pounds of PM per hour.
- (b) The PM₁₀ emissions from System #2 exhausted through Stack DS 62 shall not exceed 2.40 pounds of PM₁₀ per hour.

Compliance with these PM and PM₁₀ emission limitations combined with those specified in Conditions D.1.3, D.3.3, D.4.3, and D.6.1 renders the requirements of 326 IAC 2-2 not applicable and also satisfies the requirements of 326 IAC 2-8-4 for PM₁₀.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.2.5 Particulate Control

In order to comply with conditions D.2.2 and D.2.3, the baghouse DS62 for particulate control shall be in operation and control emissions from System #2 at all times that any part of System #2 is in operation.

D.2.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

By June 4, 2008, in order to demonstrate compliance with conditions D.2.2 and D.2.3, the Permittee shall perform PM and PM-10 testing for System #2 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. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.2.7 Visible Emissions Notations

- (a) Daily visible emission notations of the System #2 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 this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.2.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with System #2, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 5.0 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.

D.2.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling System #2. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. 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. 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 2-8-4(3)] [326 IAC 2-8-16]

D.2.11 Record Keeping Requirements

- (a) To document compliance with condition D.2.7, the Permittee shall maintain records of visible emission notations of the System #2 stack exhaust once per day.
- (b) To document compliance with condition D.2.8, the Permittee shall maintain records once per day of the total static pressure drop.
- (c) To document compliance with condition D.2.9, the Permittee shall maintain records of the results of the inspections required under condition D.2.9.
- (d) To document compliance with condition D.2.4, 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.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: System #3

Leg elevator intake (#L-32), distributor heads (#TH-1, TH-3, TH-8 & TH-9), two (2) enclosed screw conveyors, which distribute the product into two (2) 18,000-bushel bins (#BC-211 and BC-212), conveyors to silo (#BC-208 & #BC-209), conveyor to steel bin (#BC-213), three (3) surge hoppers, and weigh hopper (#S-14), all identified as System #3, controlled by baghouse DS63 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 63.

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

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

D.3.1 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 units in this section except when otherwise specified in 40 CFR Part 60, Subpart DD.

D.3.2 New Source Performance Standards (NSPS) for Grain Elevators [326 IAC 12] [40 CFR Part 60, Subpart DD]

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.302, Subpart DD)
AStandards of Performance for Grain Elevators:@

- (a) emissions shall be limited to 0.01 grain per dry cubic feet at standard conditions (gr/dscf) and 0% opacity.

D.3.3 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to SPR 127-16957-00025, issued June 19, 2003:

- (a) The PM emissions from System #3 exhausted through Stack DS 63 shall not exceed 1.79 pounds of PM per hour.
- (b) The PM₁₀ emissions from System #3 exhausted through Stack DS 63 shall not exceed 1.79 pounds of PM₁₀ per hour.

Compliance with these PM and PM₁₀ emission limitations combined with those specified in Conditions D.1.3, D.2.3, D.4.3, and D.6.1 renders the requirements of 326 IAC 2-2 not applicable and also satisfies the requirements of 326 IAC 2-8-4 for PM₁₀.

D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.3.5 Particulate Control

In order to comply with conditions D.3.2 and D.3.3, the baghouse DS63 for particulate control shall be in operation and control emissions from System #3 at all times that any part of System #3 is in operation.

D.3.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

By June 4, 2008, in order to demonstrate compliance with conditions D.3.2 and D.3.3, the Permittee shall perform PM and PM-10 testing for System #3 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. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.3.7 Visible Emissions Notations

- (a) Daily visible emission notations of the System #3 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 this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with System #3, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 5.0 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.

D.3.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling System #3. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.3.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. 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. 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 2-8-4(3)] [326 IAC 2-8-16]

D.3.11 Record Keeping Requirements

- (a) To document compliance with condition D.3.7, the Permittee shall maintain records of visible emission notations of the System #3 stack exhaust once per day.
- (b) To document compliance with condition D.3.8, the Permittee shall maintain records once per day of the total static pressure drop.
- (c) To document compliance with condition D.3.9, the Permittee shall maintain records of the results of the inspections required under condition D.3.9.
- (d) To document compliance with condition D.3.4, 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.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

The Peco loading system and ship loading, all identified as System #4, controlled by baghouse DS65 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 65.

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

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

D.4.1 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 units in this section except when otherwise specified in 40 CFR Part 60, Subpart DD.

D.4.2 New Source Performance Standards (NSPS) for Grain Elevators [326 IAC 12] [40 CFR Part 60, Subpart DD]

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.302, Subpart DD)
A Standards of Performance for Grain Elevators:Ⓜ

- (a) fugitive emissions from barge and ship loading operations shall be limited to 20% opacity.
- (b) nonfugitive emissions shall be limited to 0.01 grain per dry cubic feet at standard conditions (gr/dscf) and 0% opacity.

D.4.3 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to SPR 127-16957-00025, issued June 19, 2003:

- (a) The PM emissions from System #4 exhausted through Stack DS 65 shall not exceed 1.62 pounds of PM per hour.
- (b) The PM₁₀ emissions from System #4 exhausted through Stack DS 65 shall not exceed 1.62 pounds of PM₁₀ per hour.

Compliance with these PM and PM₁₀ emission limitations combined with those specified in Conditions D.1.3, D.2.3, D.3.3, and D.6.1 renders the requirements of 326 IAC 2-2 not applicable and also satisfies the requirements of 326 IAC 2-8-4 for PM₁₀.

D.4.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.4.5 Particulate Control

In order to comply with conditions D.4.2 and D.4.3, the baghouse DS65 for particulate control shall be in operation and control emissions from System #4 at all times that any part of System #4 is in operation.

D.4.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

By June 4, 2008, in order to demonstrate compliance with conditions D.4.2 and D.4.3, the Permittee shall perform PM and PM-10 testing for System #4 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. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.4.7 Visible Emissions Notations

- (a) Daily visible emission notations of the System #4 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 this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.4.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with System #4, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 5.0 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.

D.4.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling System #4. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.4.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. 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. 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 2-8-4(3)] [326 IAC 2-8-16]

D.4.11 Record Keeping Requirements

- (a) To document compliance with condition D.4.7, the Permittee shall maintain records of visible emission notations of the System #4 stack exhaust once per day.
- (b) To document compliance with condition D.4.8, the Permittee shall maintain records once per day of the total static pressure drop.
- (c) To document compliance with condition D.4.9, the Permittee shall maintain records of the results of the inspections required under condition D.4.9.
- (d) To document compliance with condition D.4.4, 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.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: System #5

Pneumatic dust handling system, identified as System #5, controlled by baghouse DS64 rated at 99.99% efficiency. The baghouse exhaust is re-circulated into the dust handling system.

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

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

D.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 units in this section except when otherwise specified in 40 CFR Part 60, Subpart DD.

D.5.2 New Source Performance Standards (NSPS) for Grain Elevators [326 IAC 12] [40 CFR Part 60, Subpart DD]

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.302, Subpart DD) AStandards of Performance for Grain Elevators:Ⓜ

- (a) emissions shall be limited to 0.01 grain per dry cubic feet at standard conditions (gr/dscf) and 0% opacity.

D.5.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.5.4 Particulate Control

In order to comply with conditions D.5.2, the baghouse DS64 for particulate control shall be in operation and control emissions from System #5 at all times that any part of System #5 is in operation. The exhaust from the baghouse DS64 shall be recirculated to the dust handling system in a closed loop.

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

D.5.5 Record Keeping Requirements

- (a) To document compliance with condition D.5.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Grain Dryers DR41 and DR43

Two (2) natural gas fired grain dryers, DR41 and DR43, each equipped with an integral self-cleaning screen with 61 mesh size and rated at 40 million BTU per hour, installed in May 1981, exhausted through Stack DR41/43.

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

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

D.6.1 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to SPR 127-16957-00025, issued June 19, 2003, and revised by this permit 127-20184-00025:

- (a) The two (2) natural gas fired grain dryers, DR41 and DR43, shall be limited to a combined 5,000,000 bushels of grain dried per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this throughput limitation combined with those specified in Conditions D.1.3, D.2.3, D.3.3, and D.4.3 renders the requirements of 326 IAC 2-2 not applicable and also satisfies the requirements of 326 IAC 2-8-4 for PM₁₀.

D.6.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable combined particulate emission rate from the two (2) natural gas fired grain dryers shall not exceed 53.1 pounds per hour when operating at a process weight rate of 120 tons per hour. The pounds per hour limitation was calculated using the following equation:

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:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

D.6.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.6.4 Particulate Control

In order to comply with condition D.6.2, each self cleaning screen for PM control shall be in operation and control emission from the corresponding grain dryer at all times when the corresponding grain dryer is in operation.

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

D.6.5 Visible Emissions Notations

- (a) Visible emission notations of the grain dryer stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

D.6.6 Self Cleaning Screens Inspections

An inspection shall be performed of the self cleaning screens as outlined in the preventive maintenance plan, but not less than once every six (6) months. Inspections required by this condition shall not be performed in consecutive months. All defective parts shall be repaired or replaced as necessary.

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

D.6.7 Record Keeping Requirements

- (a) To document compliance with condition D.6.1(a), the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken monthly and shall be complete and sufficient to establish compliance with the throughput limits established in condition D.6.1(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) total bushels of grain dried per calendar month from two (2) natural gas fired grain dryers, DR41 and DR43, and
- (b) To document compliance with condition D.6.5, the Permittee shall maintain records of visible emission notations of the two (2) natural gas fired grain dryers, DR41 and DR43, stack exhaust once per day.
- (c) To document compliance with condition D.6.6, the Permittee shall maintain records of the results of the inspections required under condition D.6.6.
- (d) To document compliance with condition D.6.3, 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.6.8 Reporting Requirements

A quarterly summary of the information to document compliance with condition D.6.1(a) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.7

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Open Grain Storage Pile

One (1) open-grain storage pile, with a maximum capacity of 750,000 bushels.

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

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

D.7.1 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to condition C - Fugitive Particulate Matter Emission Limitations.

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

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

Source Name: Cargill Aghorizons
Source Address: 6600 Highway 12 – Burns Waterway, Portage, IN 46368
Mailing Address: 6640 Ship Drive, Port of Indiana, Portage, IN 46368
FESOP No.: F127-20184-00025

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Cargill Aghorizons
Source Address: 6600 Highway 12 – Burns Waterway, Portage, IN 46368
Mailing Address: 6640 Ship Drive, Port of Indiana, Portage, IN 46368
FESOP No.: F127-20184-00025

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) working 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**

FESOP QUARTERLY REPORT

Source Name: Cargill Aghorizons
Source Address: 6600 Highway 12 – Burns Waterway, Portage, IN 46368
Mailing Address: 6640 Ship Drive, Port of Indiana, Portage, IN 46368
FESOP No.: F127-20184-00025
Facility: Two (2) natural gas fired grain dryers, DR41 and DR43
Parameter: combined bushels of grain dried per month
Limit: 5,000,000 bushels of grain dried per twelve (12) consecutive month period

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | 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

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

Source Name: Cargill Aghorizons
 Source Address: 6600 Highway 12 – Burns Waterway, Portage, IN 46368
 Mailing Address: 6640 Ship Drive, Port of Indiana, Portage, IN 46368
 FESOP No.: F127-20184-00025

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

| | |
|--|---|
| Source Name: | Cargill AgHorizons |
| Source Location: | 6600 Highway 12–Burns Waterway, Portage, IN 46368 |
| County: | Porter |
| SIC Code: | 5153 |
| Operation Permit No.: | 127-11201-00025 |
| Operation Permit Issuance Date: | July 6, 2000 |
| Permit Renewal No.: | 127-20184-00025 |
| Permit Reviewer: | Jed D. Wolkins |

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Cargill AgHorizons relating to the operation of a stationary grain elevator.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) truck dumps, one (1) rail car dump, and one (1) rail loadout, all identified as System #1, controlled by baghouse DS61, rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 61.
- (b) Leg intakes (#L-30, L-31, L-33, L-34 & L-35), conveyor intake (#BC-226), conveyor intake & discharge (#BC-204), conveyor intake (#BC-225), discharge (#BC-205), and conveyor intake (#BC-203), all identified as System #2, controlled by baghouse DS62 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 62.
- (c) Leg elevator intake (#L-32), distributor heads (#TH-1, TH-3, TH-8 & TH-9), two (2) enclosed screw conveyors, which distribute the product into two (2) 18,000-bushel bins (#BC-211 and BC-212), conveyors to silo (#BC-208 & #BC-209), conveyor to steel bin (#BC-213), three (3) surge hoppers, and weigh hopper (#S-14), all identified as System #3, controlled by baghouse DS63 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 63.
- (d) The Peco loading system and ship loading, all identified as System #4, controlled by baghouse DS65 rated at 99.99% efficiency, installed in May 1981, exhausted through Stack DS 65.
- (e) Pneumatic dust handling system, identified as System #5, controlled by baghouse DS64 rated at 99.99% efficiency. The baghouse exhaust is re-circulated into the dust handling system.
- (f) Two (2) natural gas fired grain dryers, DR41 and DR43, each equipped with an integral self-cleaning screen with 61 mesh size and rated at 40 million BTU per hour, installed in May 1981, exhausted through Stack DR41/43.

- (g) One (1) open-grain storage pile, with a maximum capacity of 750,000 bushels.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

Eight (8) space heaters with a combined heat input of one and two tenths (1.2) million Btu per hour.

Existing Approvals

The source has been operating under the previous FESOP 127-11201-00025 issued on July 6, 2000, with a term of five (5) years, and the following amendments and revisions:

- (a) 127-13095-00025 issued on September 21, 2001
- (b) 127-15038-00025 issued on November 27, 2001
- (c) 127-15685-00025 issued on April 18, 2002
- (d) 127-16957-00025 issued on June 19, 2003
- (c) 127-18160-00025 issued on December 9, 2003

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following PSD, BACT, RACT, LAER, MACT, or any term, limit, or condition used to avoid an applicable requirement from previous approvals have been revised in this FESOP. Conditions have been renumbered as necessary. (The **bold** language is new language that has been added, and the language with a ~~line through~~ it has been removed.)

- (a) **Condition D.5.42 New Source Performance Standards (NSPS) for Grain Elevators** [326 IAC 12] [~~40 CFR 60.302, Subpart DD~~]
Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.302, Subpart DD) **Standards of Performance for Grain Elevators:**

emissions shall be limited to 0.01 **grain per dry cubic feet at standard conditions** (gr/dscf) and 0% opacity.

~~For a system with no air flow to the outside atmosphere, this condition will limit particulate emissions to 0 pounds per hour. This facility will be considered in compliance provided the exhaust from the control device is recirculated to the dust handling system in a closed loop. Compliance with this condition will establish compliance with Operation Permit 64-07-89-0187, and render the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, not applicable.~~

Reason revised: The statement about limiting emission to 0 pounds per hour, is not practically enforceable nor is it part of the NSPS. By the nature of the system being completely enclosed and the exhaust recirculated, System #5 has no emissions. Therefore, the statement has been removed.

The second sentence of the last paragraph is a compliance determination condition. A new condition in the compliance determination section has replaced this statement.

The last sentence of the last paragraph has been removed because this permit supersedes all previous permits and the lack of emissions keeps 326 IAC 2-2 not applicable. The statement is not necessary.

- (b) ~~Condition D.6.1 PM and PM₁₀ Emission Limitations Prevention of Significant Deterioration (PSD) [326 IAC 2-2]~~ **[326 IAC 2-8-4]**
Pursuant to SPR 127-16957-00025, issued June 19, 2003, and revised by this permit 127-20184-00025:
- (a) The two (2) natural gas fired grain dryers, DR41 and DR43, shall be limited to a **combined** 5,000,000 bushels of grain dried per twelve (12) consecutive month period, with compliance determined at the end of each month.
- ~~(b) The PM emissions from two (2) grain dryers including combustion exhausted through Stack DR41/43 shall not exceed 0.014 pounds of PM per bushel, equivalent to thirty five (35) tons per year.~~
- ~~(c) The PM₁₀ emissions from two (2) grain dryers including combustion exhausted through Stack DR41/43 shall not exceed 0.014 pounds of PM₁₀ per bushel, equivalent to thirty five (35) tons per year.~~
- (bd)** Compliance with ~~these PM and PM₁₀ emission~~ **this throughput** limitations combined with those specified in Conditions D.1.23, D.2.23, D.3.23, and D.4.23, D.5.2 and D.7.4 renders the requirements of 326 IAC 2-2 not applicable and also satisfies the requirements of 326 IAC 2-8-4 for PM₁₀.

Reason revised: The screens are integral to the process. As such the emissions after the controls are considered as uncontrolled emissions for permitting. Limits set a unit's uncontrolled emissions are unnecessary. Therefore, the emission limits have been removed. The throughput limit combined with the uncontrolled emissions of the units keep the source minor for 326 IAC 2-2 and 2-7.

The following terms and conditions regarding limits from previous approvals have been determined no longer applicable; therefore, were not incorporated into this FESOP:

- (a) 127-16957-00025 issued on June 19, 2003

~~Condition D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]:~~

~~Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~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:~~

$$E = 55.0 P^{0.44} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and}$$
$$P = \text{process weight rate in tons per hour}$$

~~For a process weight rate of 120 tons per hour, the equation states an emission limit of 53.1 pounds of particulate matter per hour.~~

Reason not incorporated: System #1 is subject to 326 IAC 6-3 since it is subject a Particulate Matter limitation established by 326 IAC 12.

(b) 127-16957-00025 issued on June 19, 2003

~~Condition D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]~~

~~Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~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:~~

$$\del E = 55.0 P^{0.41} - 40 \text{ where } E = \text{rate of emission in pounds per hour; and}$$
$$\del P = \text{process weight rate in tons per hour}$$

~~For a process weight rate of 120 tons per hour, the equation states an emission limit of 53.1 pounds of particulate matter per hour.~~

Reason not incorporated: System #2 is subject to 326 IAC 6-3 since it is subject a Particulate Matter limitation established by 326 IAC 12.

(c) 127-16957-00025 issued on June 19, 2003

~~Condition D.3.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]~~

~~Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~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:~~

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

~~For a process weight rate of 120 tons per hour, the equation states an emission limit of 53.1 pounds of particulate matter per hour.~~

Reason not incorporated: System #3 is subject to 326 IAC 6-3 since it is subject a Particulate Matter limitation established by 326 IAC 12.

(d) 127-16957-00025 issued on June 19, 2003

~~Condition D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]~~

~~Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~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:~~

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

~~For a process weight rate of 120 tons per hour, the equation states an emission limit of 53.1 pounds of particulate matter per hour.~~

Reason not incorporated: System #4 is subject to 326 IAC 6-3 since it is subject a Particulate Matter limitation established by 326 IAC 12.

- (e) 127-16957-00025 issued on June 19, 2003

~~Condition D.5.2 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]~~

- ~~(a) The PM emissions from System #5, a closed loop system with no emissions to the atmosphere, shall not exceed 0.000 pounds of PM per hour.~~
- ~~(b) The PM₁₀ emissions from System #5, a closed loop system with no emissions to the atmosphere, shall not exceed 0.000 pounds of PM₁₀ per hour.~~
- ~~(c) Compliance with these PM and PM₁₀ emission limitations combined with those specified in Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.6.1 and D.7.1 renders the requirements of 326 IAC 2-2 not applicable and also satisfies the requirements of 326 IAC 2-8-4 for PM₁₀.~~

Reason not incorporated: The limits of 0.000 pounds per hour are not practically enforceable. There is no place to conduct a performance test. By the nature of the system being completely enclosed and the exhaust recirculated, System #5 has no emissions. Including a limit is not necessary. Therefore, the condition has been removed.

- (f) 127-16957-00025 issued on June 19, 2003

~~Condition D.7.1 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-8-4]~~

- ~~(a) The PM emissions from open grain storage pile shall not exceed 2.15 tons of PM per year.~~
- ~~(b) The PM₁₀ emissions from open grain storage pile shall not exceed 1.04 tons of PM₁₀ per year.~~
- ~~(c) Compliance with these PM and PM₁₀ emission limitations combined with those specified in Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.5.2 and D.6.1 renders the requirements of 326 IAC 2-2 not applicable and also satisfies the requirements of 326 IAC 2-8-4 for PM₁₀.~~

Reason not incorporated: The limits of 2.15 tons per year and 1.04 tons per year as annual limits are not practically enforceable. Also, there is no point of emissions to conduct a performance test. In addition, the emissions are uncontrolled emissions. Limiting a unit's uncontrolled emissions is unnecessary. Therefore, the emission limits have been removed. The emissions are less than PSD thresholds. The limits in other conditions on other units combined with the uncontrolled emissions of this and other units keep the source minor for 326 IAC 2-2 and 2-7.

Air Pollution Control Justification as an Integral Part of the Process

IDEM approved the company's justification previously.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP renewal application for the purposes of this review was received on September 27, 2004. Additional information was received on March 14, 2005.

A notice of completeness letter was mailed to the source on November 18, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations, pages 1 through 6.

Unrestricted Potential Emissions

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

| Pollutant | Unrestricted Potential Emissions (tons/yr) |
|-----------------|--|
| PM | 509 |
| PM-10 | 509 |
| SO ₂ | 0.2 |
| VOC | 2 |
| CO | 29 |
| NO _x | 35 |

| HAPs | Unrestricted Potential Emissions (tons/yr) |
|---------------------|--|
| Benzene | 0.0007 |
| Dichlorobenzene | 0.0004 |
| Formaldehyde | 0.026 |
| Hexane | 0.631 |
| Toluene | 0.001 |
| Lead Compounds | 0.0002 |
| Cadmium Compounds | 0.0004 |
| Chromium Compounds | 0.0005 |
| Manganese Compounds | 0.0001 |
| Nickel Compounds | 0.0007 |
| Total | 0.661 |

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

| Process/emission unit | Potential To Emit (tons/year) | | | | | | |
|---------------------------|-------------------------------|-------------|-----------------|-------------|-------------|-----------------|--------------|
| | PM | PM-10 | SO ₂ | VOC | CO | NO _x | HAPs |
| DS61, System #1 | 15.8 | 15.8 | - | - | - | - | - |
| DS62, System #2 | 10.5 | 10.5 | - | - | - | - | - |
| DS63, System #3 | 7.88 | 7.88 | - | - | - | - | - |
| DS65, System #4 | 7.13 | 7.13 | - | - | - | - | - |
| DS #64, System # 5 | Negligible | Negligible | - | - | - | - | - |
| DR41 & DR43, Grain Dryers | 35.0 | 35.0 | 0.21 | 1.93 | 29.4 | 35.0 | 0.661 |
| Storage Pile (Fugitive) | 2.15 | 1.04 | - | - | - | - | - |
| Space Heaters | 0.0 | 0.0 | 0.0 | 0.0 | 0.4 | 0.5 | 0.0 |
| Total Emissions | 78.5 | 77.4 | 0.21 | 1.93 | 29.8 | 35.5 | 0.661 |

Both PM and PM-10 emissions from System #1, #2, #3, and #4 are each limited to 3.60, 2.40, 1.79, and 1.62 pounds per hour by the pervious permit, F127-16957-00025, and this permit, F127-20184-00025. The total grain throughput to the Grain Dryers DR41 and DR43 is limited to a combined 5,000,000 bushells per 12 consecutive month period by the pervious permit, F127-16957-00025, and this permit, F127-20184-00025. These limits are in Conditions D.1.2, D.2.2, D.3.2, D.4.2, and D.6.1.

County Attainment Status

The source is located in Porter County.

| Pollutant | Status |
|-----------------|------------------------|
| PM-2.5 | Nonattainment |
| PM-10 | Attainment |
| SO ₂ | Attainment |
| NO ₂ | Attainment |
| 1 Hour Ozone | Severe nonattainment |
| 8 Hour Ozone | Moderate nonattainment |
| CO | Attainment |
| Lead | attainment |

- (a) 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.
 - (1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Porter County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
 - (2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Porter County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

- (b) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Porter County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Porter County has been classified as attainment or unclassifiable in Indiana for PM-10, SO₂, NO_x, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emissions
Although this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3, the applicable New Source Performance Standard, Subpart DD, was in effect as of August 3, 1978, prior to August 7, 1980 and therefore, fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

| Pollutant | Emissions (tons/yr) |
|------------------|---------------------|
| PM | 78.5 |
| PM-10 | 77.4 |
| SO ₂ | 0.21 |
| VOC | 1.93 |
| CO | 29.8 |
| NO _x | 35.5 |
| Single HAP | 0.631 |
| Combination HAPs | 0.661 |

- (a) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories.

Federal Rule Applicability

- (a) This source is subject to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) Standards of Performance for Grain Elevators because the source has truck, rail and ship loading and unloading facilities at a grain storage elevator located at a wheat and/or wet/dry corn mill with a permanent grain storage capacity of one (1) million or more bushels.
 - (1) This rule limits the opacity as follows from:
 - (A) Grain handling operations, including bucket elevators or legs, to 0% opacity,
 - (B) Fugitive truck unloading, railcar unloading, and railcar loading operations to 5% opacity,

- (C) Fugitive emissions from truck loading operations to 10% opacity, and
 - (D) Fugitive ship and barge loading operations to 20% opacity.
- (2) This rule also limits PM emissions from grain handling operations to 0.01 grains per dry standard cubic foot of outlet air or less, except grain dryers.
- (b) Pursuant to 40 CFR 60.302, the two (2) grain dryers are not subject to the requirements of the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) because the rack dryers= gasses exhaust through screen filters finer (61 mesh) than 50 mesh.
 - (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) included in this permit.

State Rule Applicability – Entire Source

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

The source is not required to submit an Emergency Reduction Plan.

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

- (a) If required by specific condition(s) in Section D of the permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

326 IAC 1-7-3 (a) (Actual Stack Height Provisions)

The current stacks at the source are not subject to the provisions of 326 IAC 1-7-3 (a), since each stack has less than twenty-five (25) tons per year of actual emissions after controls of PM and SO₂.

326 IAC 2-1.1-5

The IDEM can not issue a registration, permit, modification approval, or operating permit revision that would allow a source to cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS). The total source potential emissions of PM-2.5 is less than 100 tons per year. The source has not conducted any modifications to trigger Nonattainment New Source Review and is currently considered a minor Nonattainment New Source Review source. Therefore the requirements of Nonattainment New Source Review do not apply.

326 IAC 2-2 (Prevention of Significant Deterioration)

The total source potential emissions of PM, PM-10, SO₂, NO_x, CO, and Lead are less than 250 tons per year. Both PM and PM-10 emissions from System #1, #2, #3, and #4 are each limited to 3.60, 2.40, 1.79, and 1.62 pounds per hour. The total grain throughput to the Grain Dryers DR41 and DR43 is limited to a combined 5,000,000 bushells per 12 consecutive month period. These limits limit the source wide potential emission of PM and PM-10 to 78.5 and 77.4 tons per year. The source is not one of the 28 listed sources. The applicable New Source Performance Standard, Subpart DD, was in effect as of August 3, 1978, prior to August 7, 1980. The source was constructed in May 1981. The source has not conducted any modifications to trigger PSD and is currently considered a minor PSD source. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

326 IAC 2-3 (Emission Offset)

The total source potential emissions of NO_x is less than 100 tons per year. The total source potential emissions of VOC is less than 25 tons per year. The source is not one of the 28 listed sources. The applicable New Source Performance Standard, Subpart DD, was in effect as of August 3, 1978, prior to August 7, 1980. The source was constructed in May 1981. The source has not conducted any modifications to trigger Emission Offset and is currently considered a minor Emission Offset source. Therefore the requirements of 326 IAC 2-3 (Emission Offset) do not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The source is not a major source of HAPs. The source was existing as of July 27, 1997, and has HAP PTE less than 10 tons per year of a single HAP and 25 tons per year of all HAPs. The Permittee has not constructed or reconstructed a major source of HAPs.

326 IAC 2-6 (Emission Reporting)

This source, which is located in Porter County, is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit greater than 25 tons per year (tpy) of NO_x, and it may emit NO_x into the ambient air at levels equal to or greater than 25 tpy. In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted by July 1 if the source emits NO_x into the ambient air equal to or greater than 25 tons during the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-8-4 (FESOP)

The potential to emit before control of the entire source is greater than 100 tons/yr for PM10 and less than 100 tons/yr for all other criteria pollutants. Pursuant to 326 IAC 2-8-4 (FESOP), and SPM 127-16957-00005, issued on June 19, 2003, the source has accepted emission rate limits to limit the PM10 emissions from the entire source to less than 100 tons per year. The existing limits are revised to the following limits:

- (a) The PM10 emissions from System #1, #2, #3, and #4 are limited to 3.60, 2.40, 1.79, and 1.62 pounds per hour, respectively.
- (b) The total grain throughput to the Grain Dryers DR41 and DR43 is limited to a combined 5,000,000 bushells per 12 consecutive month period.

All of the above limits are equivalent to 76.3 tons per year of PM10 emissions. Combined with the PM10 emissions from the storage piles, System 5, and the space heaters, the PM10 emissions from the entire source are limited to less than 100 tons/yr. Compliance with these limits makes the requirements of 326 IAC 2-7 (Part 70 Program) not applicable and also makes the source minor for PSD.

The hourly limits on System 5, the Grain Dryers, and the storage pile have been removed. See "Existing Approvals" above for the reasoning.

326 IAC 5-1 (Opacity Limitations)

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

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), Permittee is in violation if any of the criteria in 326 IAC 6-4-2 occur.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is subject to 326 IAC 6-5. The source did not have all preconstruction approvals before December 13, 1985. Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on June 30, 1999. The plan consists of enclosing loading and unloading operations, enclosing grain transfer operations and using outdoor storage only in an overflow situation.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-2, the particulate from the Grain Dryers, DR41 and DR 43, shall be limited by the following:

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:

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

Pursuant 326 IAC 6-3-1 (c)(5), manufacturing processes with particulate matter limited by 326 IAC 12 are not subject to 326 IAC 6-3. Therefore, System #1, System #2, System #3, System #4, and System #5 are not subject to this rule. Previous permits incorrectly stated that these processes were subject.

Testing Requirements

Systems 2, 3, and 4 require a high level of PM and PM-10 control to comply with their PM and PM-10 emission limitations to avoid Title V permitting. Therefore, the Permittee will be required to test those systems for PM and PM-10 to ensure the limits are being met.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. System 1 has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the System #1 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 this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (f) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with System #1, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 5.0 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.
 - (g) 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.
 - (h) An inspection shall be performed each calendar quarter of all bags controlling System #1. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

- (i) In the event that bag failure has been observed:
 - (i) 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 deviation from 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.
 - (ii) 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).

These monitoring conditions are necessary because the baghouse for system 1 must operate properly to ensure compliance with 326 IAC 12 (40 CFR 60.300, Subpart DD), 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 2-8 (FESOP).

- 2. System 2 has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the System #2 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 this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (f) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with System #2, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 5.0 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.
- (g) 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.
- (h) An inspection shall be performed each calendar quarter of all bags controlling System #2. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (i) In the event that bag failure has been observed:
 - (i) 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 deviation from 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.
 - (ii) 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).

These monitoring conditions are necessary because the baghouse for system 2 must operate properly to ensure compliance with 326 IAC 12 (40 CFR 60.300, Subpart DD), 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 2-8 (FESOP).

3. System 3 has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the System #3 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 this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (f) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with System #3, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 5.0 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.
 - (g) 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.
 - (h) An inspection shall be performed each calendar quarter of all bags controlling System #3. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
 - (i) In the event that bag failure has been observed:

- (i) 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 deviation from 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.
- (ii) 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).

These monitoring conditions are necessary because the baghouse for system 3 must operate properly to ensure compliance with 326 IAC 12 (40 CFR 60.300, Subpart DD), 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 2-8 (FESOP).

4. System 4 has applicable compliance monitoring conditions as specified below:
- (a) Daily visible emission notations of the System #4 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 this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (f) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with System #4, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 5.0 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.
- (g) 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.
- (h) An inspection shall be performed each calendar quarter of all bags controlling System #4. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (i) In the event that bag failure has been observed:
 - (i) 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 deviation from 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.
 - (ii) 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).

These monitoring conditions are necessary because the baghouse for system 3 must operate properly to ensure compliance with 326 IAC 12 (40 CFR 60.300, Subpart DD), 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 2-8 (FESOP).

5. The two (2) natural gas fired grain dryers have applicable compliance monitoring conditions as specified below:
- (a) Visible emission notations of the grain dryer stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (f) An inspection shall be performed of the self cleaning screens as outlined in the preventive maintenance plan, but not less than once every six (6) months. Inspections required by this condition shall not be performed in consecutive months. All defective parts shall be repaired or replaced as necessary.

These monitoring conditions are necessary because the self-cleaning screens for the two (2) natural gas fired grain dryers must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this stationary grain elevator shall be subject to the conditions of the **FESOP 127-20184-00025**.

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

Addendum to the Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

| | |
|--|---|
| Source Name: | Cargill AgHorizons |
| Source Location: | 6600 Highway 12–Burns Waterway, Portage, IN 46368 |
| County: | Porter |
| SIC Code: | 5153 |
| Operation Permit No.: | 127-11201-00025 |
| Operation Permit Issuance Date: | July 6, 2000 |
| Permit Renewal No.: | 127-20184-00025 |
| Permit Reviewer: | Jed D. Wolkins |

On May 20, 2005, the Office of Air Quality (OAQ) had a notice published in the Portage Public Library, 2665 Irving Street, Portage, Indiana, stating that Cargill AgHorizons had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a stationary grain elevator. The notice also stated that OAQ proposed to issue a permit 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.

Upon further review, the OAQ has decided to make the following revisions to the permit (**bolded** language has been added and the language with a ~~line through it~~ has been deleted). Only the affected paragraph of a given condition is shown below.

Change 1: In paragraph (a) of condition B.12, the dash between the words “shall” and “maintain” has been removed. This was a typographical error.

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

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

Change 2: In paragraph (f) of condition C.9, the “r” in the word “renovation” has been capitalized. This was a capitalization error.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(f) Demolition and ~~R~~Renovation

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

Change 3: In paragraph (d) of conditions D.1.10, D.2.11, D.3.11, D.4.11, and D.6.7 and in paragraph (a) of condition D.5.5, the word “of” between the words “maintain” and “records” has been removed. These were typographical errors.

D.1.10 Record Keeping Requirements

(d) To document compliance with condition D.1.4, the Permittee shall maintain ~~of~~ records of any additional inspections prescribed by the Preventive Maintenance Plan.

D.2.11 Record Keeping Requirements

(d) To document compliance with condition D.2.4, the Permittee shall maintain ~~of~~ records of any additional inspections prescribed by the Preventive Maintenance Plan.

D.3.11 Record Keeping Requirements

(d) To document compliance with condition D.3.4, the Permittee shall maintain ~~of~~ records of any additional inspections prescribed by the Preventive Maintenance Plan.

D.4.11 Record Keeping Requirements

(d) To document compliance with condition D.4.4, the Permittee shall maintain ~~of~~ records of any additional inspections prescribed by the Preventive Maintenance Plan.

D.5.5 Record Keeping Requirements

(a) To document compliance with condition D.5.3, the Permittee shall maintain ~~of~~ records of any additional inspections prescribed by the Preventive Maintenance Plan.

D.6.7 Record Keeping Requirements

(d) To document compliance with condition D.6.3, the Permittee shall maintain ~~of~~ records of any additional inspections prescribed by the Preventive Maintenance Plan.

**Appendix A: Emissions Calculations
PM Emissions from Processes**

**Company Name: Cargill AgHorizons
Address City IN Zip: 6600 Highway 12-Burns Waterway, Portage, IN 46368
Permit Number: 127-20184-00025
Plt ID: 127-00025
Reviewer: Jed D. Wolkins
Date: February 3, 2005**

PM = PM10

| Unit | limit (lbs/hr) | emission factor (pounds/ bushel) | limit (bushels/twelve consecutive month period) | limited PTE (tons/yr) |
|----------------------------|-------------------|---|--|-----------------------------|
| System #1 | 3.60 | - | - | 15.77 |
| System #2 | 2.40 | - | - | 10.51 |
| System #3 | 1.79 | - | - | 7.84 |
| System #4 | 1.62 | - | - | 7.10 |
| Grain Dryers DR41 and DR43 | - | 0.014 | 5000000 | 35.00 |
| Total | | | | 76.22 |

Methodology

PM is assumed to equal PM-10.

Systems #1-4 PM limited emissions (tons/yr) = limit (lbs/hr) * 8760 (hr/yr) / (2000 (lbs/tons))

Grain Dryers DR41 and DR43 PM limited emissions (tons/yr) = emission factor (lbs/bushell) * limit (bushells/ twelve consecutive month period) * 1 (twelve consecutive month period/yr) / (2000 (lbs/tons))

The limits come from Sections D.1 through D.4 and D.6 of 127-16957-00025 and carried over into the renewal 127-20184-00025.

The emission factor for Grain Dryers DR41 and DR43 is based on stack testing done on Grain Dryer 41, on October 17, 1986. The tested emission rate was 0.007 lbs per bushel. The factor is multiplied by two to account for both dryers. This results in the 0.014 lbs per bushel emission factor. All three runs were used with results of 23, 16, and 51 lbs per hour. The throughput was 4571 bushels per hour.

368

ay, Portage, IN 46368

8760 hr/yr =
1.33 tons/yr
2.98 tons/yr
4.31 tons/yr

0.66 tons/yr
1.49 tons/yr
2.15 tons/yr

8760 hr/yr =
0.66 tons/yr
1.41 tons/yr
2.07 tons/yr

0.33 tons/yr
0.70 tons/yr
1.04 tons/yr

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Grain Dryers**

Company Name: Cargill AgHorizons
Address City IN Zip: 6600 Highway 12-Burns Waterway, Portage, IN 46368
Permit Number: 127-20184-00025
Plt ID: 127-00025
Reviewer: Jed D. Wolkins
Date: February 3, 2005

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

80.0

700.8

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|-------------------------------|-----------|-------|-----|-------------|-----|------|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 0.6 | 100.0 | 5.5 | 84.0 |
| | | | | **see below | | |
| Potential Emission in tons/yr | 0.7 | 2.7 | 0.2 | 35.0 | 1.9 | 29.4 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Boiler
 HAPs Emissions**

**Company Name: Cargill AgHorizons
 Address City IN Zip: 6600 Highway 12-Burns Waterway, Portage, IN 46368
 Permit Number: 127-20184-00025
 Pit ID: 127-00025
 Reviewer: Jed D. Wolkins
 Date: February 3, 2005**

| HAPs - Organics | | | | | |
|-------------------------------|-----------|-----------------|--------------|-----------|-----------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 7.358E-04 | 4.205E-04 | 2.628E-02 | 6.307E-01 | 1.191E-03 |

| HAPs - Metals | | | | | |
|-------------------------------|-----------|-----------|-----------|-----------|-----------|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 1.752E-04 | 3.854E-04 | 4.906E-04 | 1.332E-04 | 7.358E-04 |

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Space heaters**

Company Name: Cargill AgHorizons
Address City IN Zip: 6600 Highway 12-Burns Waterway, Portage, IN 46368
Permit Number: 127-20184-00025
Pit ID: 127-00025
Reviewer: Jed D. Wolkins
Date: February 3, 2005

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.2

10.5

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|-------------------------------|-----------|-------|-----|-------------|-----|------|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 0.6 | 100.0 | 5.5 | 84.0 |
| | | | | **see below | | |
| Potential Emission in tons/yr | 0.0 | 0.0 | 0.0 | 0.5 | 0.0 | 0.4 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 6 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Cargill AgHorizons

Address City IN Zip: 6600 Highway 12-Burns Waterway, Portage, IN 46368

Permit Number: 127-20184-00025

Pit ID: 127-00025

Reviewer: Jed D. Wolkins

Date: February 3, 2005

| HAPs - Organics | | | | | |
|-------------------------------|-----------|-----------------|--------------|-----------|-----------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 1.104E-05 | 6.307E-06 | 3.942E-04 | 9.461E-03 | 1.787E-05 |

| HAPs - Metals | | | | | |
|-------------------------------|-----------|-----------|-----------|-----------|-----------|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 2.628E-06 | 5.782E-06 | 7.358E-06 | 1.997E-06 | 1.104E-05 |

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations

Company Name: Cargill AgHorizons
Address City IN Zip: Burns Waterway, Portage, IN 461
Permit Number: 127-20184-00025
Plt ID: 127-00025
Reviewer: 6600 Highway 12-Burns Waterwa
Date: February 3, 2005

** PM emissions before controls **

Wind Erosion
 Dropping/Handling 90 ton/hr x 0.0076 lb/ton / 2000 lb/ton x
 Total emissions before controls:

** PM emissions after controls **

Wind Erosion 1.33 tons/yr x 50.0% emitted after controls =
 Dropping/Handling 2.98 tons/yr x 50.0% emitted after controls =
 Total emissions after controls:

** PM-10 emissions before controls **

Wind Erosion
 Dropping/Handling 90 ton/hr x 0.0036 lb/ton / 2000 lb/ton x
 Total emissions before controls:

** PM-10 emissions after controls **

Wind Erosion 0.66 tons/yr x 50.0% emitted after controls =
 Dropping/Handling 1.41 tons/yr x 50.0% emitted after controls =
 Total emissions after controls:

* * storage * *

Storage emissions, which result from wind erosion, are determined by the following calculations:

$$E_f = 1.7 \cdot (s/1.5) \cdot (365-p)/235 \cdot (f/15)$$

$$= 18.89 \text{ lb/acre/day}$$

where s = 10 % silt content of material
 p = 130 days of rain greater than or equal to 0.01 inches
 f = 25 % of wind greater than or equal to 12 mph

$$E_p (\text{storage}) = E_f \cdot sc \cdot (40 \text{ cuft/ton}) / (2000 \text{ lb/ton}) / (43560 \text{ sqft/acre}) / (50 \text{ ft}) \cdot (365 \text{ day/yr})$$

$$= 1.33 \text{ tons/yr}$$

where sc = 21 ,000 tons storage capacity

For PM-10: $E_p = 50\%$ of PM (estimated)
 Therefore PM-10 = 0.66 tons/yr

56 lb/bushel * 750000 bushels 2000 lb/ton = 21000

** handling **

The following calculations determine the amount of emissions created by dropping of material, based on 8 AP-42 13.2.4 (Fifth edition, 1/95).

$$\begin{aligned} E_f &= k(0.0032) * (U/5)^{1.3}/(M/2)^{1.4} \\ &= 0.0076 \text{ lb/ton} \\ \text{where } k &= 0.74 \text{ (particle size multiplier)} \\ U &= 1.3 \text{ mile/hr mean wind speed} \\ M &= 0.25 \% \text{ material moisture content} \end{aligned}$$

For PM=10: $k = 0.35$
Therefore $E_f = 0.0036 \text{ lb/ton}$

tons

1760 hours of use and