INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: February 28, 2005

RE: Consolidated Grain & Barge Company / MSOP 029-20284-00024

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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MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Consolidated Grain & Barge Company
210 George Street
Aurora, Indiana 47001

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

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

Operation Permit No.: MSOP 029-20284-00024	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 28, 2005 Expiration Date: February 28, 2010

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary whole grain handling operation.

Authorized Individual:	Regional Operations Manager
Source Address:	210 George Street, Aurora, Indiana 47001
Mailing Address:	210 George Street, Aurora, Indiana 47001
General Source Phone:	(812) 926-0740
SIC Code:	5153
County Location:	Dearborn
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) One (1) natural gas fired column grain dryer, rated at 12.0 million (MM) British thermal units (Btu) per hour, processing a maximum of 2,000 bushels of grain per hour, exhausting through stack S-3;

(b) One (1) main grain dump shed (two sided) enclosing two (2) dump pits (Pits #1 and #2), with a maximum capacity of 1200 tons per hour, with a baghouse for particulate matter control, exhausting through stack S-1;

(c) One (1) grain dump shed (two sided) enclosing one (1) dump pit (Pit # 3), with a maximum capacity of 600 tons per hour, controlled with baghouse for particulate matter, exhausting through stack S-2;

(d) One (1) grain dump shed (two sided) enclosing one (1) dump pit (Pit # 4), with a maximum capacity of 450 tons per hour, controlled by choke feeding to control particulate matter;

(e) Two (2) steel storage bins (ID Nos. 1 and 2), each with a storage capacity of 750 tons;

(f) Two (2) steel storage bins (ID Nos. 3 and 4), each with a storage capacity of 750 tons;

(g) Two (2) steel storage bins (ID Nos. 5 and 6), each with a storage capacity of 7560 tons;

(h) One (1) steel storage bin (ID No. 7) with a storage capacity of 390 tons;

(i) Three (3) enclosed reclaim (belt, drag) conveyors with maximum capacity of 600 tons per hour;

(j) Eight (8) enclosed bin fill spouts with maximum capacity of 600 tons per hour;

(k) Four (4) enclosed bin fill conveyors with maximum capacity of 600 tons per hour;

(l) Two (2) enclosed distributors with maximum capacity of 600 tons per hour;

(m) Three (3) enclosed bucket elevator(s) with maximum capacity of 900 tons per hour;

(n) One (1) enclosed wet grain bucket elevator with maximum capacity of 150 tons per hour;

(o) One (1) enclosed dry grain bucket elevator with maximum capacity of 150 tons per hour;

(p) One (1) enclosed railcar loading spout with a maximum capacity of 540 tons per hour;

(q) One (1) enclosed telescoping barge loading spout with a maximum capacity of 1200 tons per hour;

(r) One (1) 3 cubic yard clamshell bucket crane with maximum capacity of 300 tons per hour for unloading bulk product barges and direct loading of trucks;

(s) One (1) covered barge loading belt with a maximum capacity of 1200 tons per hour;

(t) One (1) covered barge loading belt with a maximum capacity of 450 tons per hour;

(u) One (1) covered truck load out belt with a maximum capacity of 170 tons per hour; and

(v) One (1) truck load out spout with a maximum capacity of 340 tons per hour.

SECTION B GENERAL CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

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

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

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

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

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

B.5 Modification to Permit [326 IAC 2]

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

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

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

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

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

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

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

(b) The Permittee shall implement the PMPs, 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 PMP's shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

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

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

(d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a permitted 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 this title or the conditions of this permit or any operating permit revisions;

(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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) 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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ shall issue a revised permit.

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

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

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

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 Permit Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 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.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) 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

C.5 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.6 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements

C.7 Compliance Monitoring [326 IAC 2-1.1-11]

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

C.8 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.9 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

(a) Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.

(b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.10 Compliance Response Plan - Preparation and Implementation

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, 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 a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test

(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 emissions unit 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 re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 General Record Keeping Requirements [326 IAC 2-6.1-5]

(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 when operation begins.

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

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

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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, 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.

SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) natural gas fired column grain dryer, rated at 12.0 million (MM) British thermal units (Btu) per hour, processing a maximum of 2,000 bushels of grain per hour, exhausting through stack S-3;

(b) One (1) main grain dump shed (two sided) enclosing two (2) dump pits (Pits #1 and #2), with a maximum capacity of 1200 tons per hour, with a baghouse for particulate matter control, exhausting through stack S-1;

(c) One (1) grain dump shed (two sided) enclosing one (1) dump pit (Pit # 3), with a maximum capacity of 600 tons per hour, controlled with baghouse for particulate matter, exhausting through stack S-2;

(d) One (1) grain dump shed (two sided) enclosing one (1) dump pit (Pit # 4), with a maximum capacity of 450 tons per hour, controlled by choke feeding to control particulate matter;

(e) Two (2) steel storage bins (ID Nos. 1 and 2), each with a storage capacity of 750 tons;

(f) Two (2) steel storage bins (ID Nos. 3 and 4), each with a storage capacity of 750 tons;

(g) Two (2) steel storage bins (ID Nos. 5 and 6), each with a storage capacity of 7560 tons;

(h) One (1) steel storage bin (ID No. 7) with a storage capacity of 390 tons;

(i) Three (3) enclosed reclaim (belt, drag) conveyors with maximum capacity of 600 tons per hour;

(j) Eight (8) enclosed bin fill spouts with maximum capacity of 600 tons per hour;

(k) Four (4) enclosed bin fill conveyors with maximum capacity of 600 tons per hour;

(l) Two (2) enclosed distributors with maximum capacity of 600 tons per hour;

(m) Three (3) enclosed bucket elevator(s) with maximum capacity of 900 tons per hour;

(n) One (1) enclosed wet grain bucket elevator with maximum capacity of 150 tons per hour;

(o) One (1) enclosed dry grain bucket elevator with maximum capacity of 150 tons per hour;

(p) One (1) enclosed railcar loading spout with a maximum capacity of 540 tons per hour;

(q) One (1) enclosed telescoping barge loading spout with a maximum capacity of 1200 tons per hour;

(r) One (1) 3 cubic yard clamshell bucket crane with maximum capacity of 300 tons per hour for unloading bulk product barges and direct loading of trucks;

(s) One (1) covered barge loading belt with a maximum capacity of 1200 tons per hour;

(t) One (1) covered barge loading belt with a maximum capacity of 450 tons per hour;

(u) One (1) covered truck load out belt with a maximum capacity of 170 tons per hour; and

(v) One (1) truck load out spout with a maximum capacity of 340 tons per hour.

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

Emission Limitations and Standards

D.1.1 Nonattainment Area Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations), the permittee shall comply with the following:

(a) The permittee shall provide for good housekeeping and maintenance procedures which is defined as those practices which would be followed by a prudent management in controlling, regulating, and maintaining clean and safe conditions of buildings and grounds. In particular, these practices are required to minimize the opportunity for particulate matter to become airborne and leave the property.

(b) Good housekeeping practices shall be conducted in the following areas or operations:

(1) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floors, decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentration; and grain driers with respect to accumulated particulate matter.

(2) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.

(3) Dust from driveways, access roads, and other areas of travel shall be controlled.

(4) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(c) Good equipment maintenance will be those procedures, which eliminate or minimize emissions from equipment or a system caused by:

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

(d) To insure the above good housekeeping and maintenance procedures, emissions from the affected areas, operations, equipment and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the one (1) grain dryer, the seven (7) storage bins, the three (3) grain dump sheds and the grain handling operations shall not exceed 45.9 lbs/hr for each operation (grain receiving, grain drying, bin loading, and grain shipping) when each operating at a process weight rate of 57.61 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.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.4 Particulate Control

Pursuant to CP-029-9354-00024, issued on June 8, 1998, and in order to comply with condition D.1.2, the baghouses for particulate control shall be in operation and control emissions from the grain dump pits #1, #2 and #3 at all times that the grain dump pits #1, #2 and #3 are in operation.

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

D.1.5 Visible Emissions Notations

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

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the grain dump pits #1, #2 and #3, at least once per shift when the processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 2.0 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 and Implementation 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.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the grain dump pits #1, #2 and #3 when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.8 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 and Implementation 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.

Record Keeping and Reporting Requirement

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the baghouses stack exhaust once per shift.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7.

(d) To document compliance with Condition D.1.3, 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.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	**Consolidated Grain & Barge Company**
Address:	**210 George Street**
City:	**Aurora, Indiana 47001**
Phone #:	**(812) 926-0740**
MSOP #:	**029-20284-00024**

I hereby certify that Consolidated Grain & Barge Company is
☐ still in operation.
☐ no longer in operation.

I hereby certify that Consolidated Grain & Barge Company is
☐ in compliance with the requirements of MSOP **029-20284-00024**.
☐ not in compliance with the requirements of MSOP **029-20284-00024**.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**Consolidated Grain & Barge Company**
Source Location:	**210 George Street, Aurora, Indiana 47001**
County:	**Dearborn**
SIC Code:	**5153**
Construction Permit No.:	**CP-029-9354-00024**
Construction Permit Issuance Date:	**June 8, 1998**
Operation Permit No.:	**029-20284-00024**
Permit Reviewer:	**Seema Roy/EVP**

The Office of Air Quality (OAQ) has reviewed an application from Consolidated Grain & Barge Company relating to the operation of a whole grain handling operation.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) natural gas fired column grain dryer, rated at 12.0 million (MM) British thermal units (Btu) per hour, processing a maximum of 2,000 bushels of grain per hour, exhausting through stack S-3;

(b) One (1) main grain dump shed (two sided) enclosing two (2) dump pits (Pits #1 and #2), with a maximum capacity of 1200 tons per hour, with a baghouse for particulate matter control, exhausting through stack S-1;

(c) Two (2) steel storage bins (ID Nos. 1 and 2), each with a storage capacity of 750 tons;

(d) Two (2) steel storage bins (ID Nos. 3 and 4), each with a storage capacity of 750 tons;

(e) Two (2) steel storage bins (ID Nos. 5 and 6), each with a storage capacity of 7560 tons;

(f) Three (3) enclosed reclaim (belt, drag) conveyors with maximum capacity of 600 tons per hour;

(g) Eight (8) enclosed bin fill spouts with maximum capacity of 600 tons per hour;

(h) Four (4) enclosed bin fill conveyors with maximum capacity of 600 tons per hour;

(i) Two (2) enclosed distributors with maximum capacity of 600 tons per hour;

(j) Three (3) enclosed bucket elevator(s) with maximum capacity of 900 tons per hour;

(k) One (1) enclosed wet grain bucket elevator with maximum capacity of 150 tons per hour; and

(l) One (1) enclosed dry grain bucket elevator with maximum capacity of 150 tons per hour.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

(a) One (1) grain dump shed (two sided) enclosing one (1) dump pit (Pit # 3), with a maximum capacity of 600 tons per hour, controlled with baghouse for particulate matter, exhausting through stack S-2;

(b) One (1) grain dump shed (two sided) enclosing one (1) dump pit (Pit # 4), with a maximum capacity of 450 tons per hour, controlled by choke feeding to control particulate matter;

(c) One (1) steel storage bin (ID No. 7) with a storage capacity of 390 tons;

(d) One (1) enclosed railcar loading spout with a maximum capacity of 540 tons per hour;

(e) One (1) enclosed telescoping barge loading spout with a maximum capacity of 1200 tons per hour;

(f) One (1) 3 cubic yard clamshell bucket crane with maximum capacity of 300 tons per hour for unloading bulk product barges and direct loading of trucks;

(g) One (1) covered barge loading belt with a maximum capacity of 1200 tons per hour;

(h) One (1) covered barge loading belt with a maximum capacity of 450 tons per hour;

(i) One (1) covered truck load out belt with a maximum capacity of 170 tons per hour; and

(j) One (1) truck load out spout with a maximum capacity of 340 tons per hour.

Note: According to the information provided by the source the above unpermitted units were all installed at the same time that the permitted units were installed. However these units were erroneously not included by the source in the construction permit application.

Existing Approvals

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

Construction Permit No. CP- 029-9354-00024, issued on June 8, 1998.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled “Unpermitted Emission Units and Pollution Control Equipment”.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^oF)
S-1	Pits #1 and #2	14	1.8 x 0.839(Rect)	114,700	Ambient
S-2	Pit #3	11	2.5	20,000	Ambient
S-3	Grain Dryer	45	2.17	25,000	160

Recommendation

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

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

A complete application for the purposes of this review was received on October 19, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 4).

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	202.4
PM-10	51
SO_2	0.0
VOC	0.3
CO	4.4
NO_x	5.3

HAPs	Potential to Emit (tons/yr)
Total Haps	0.1

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 is less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

County Attainment Status

The source is located in Dearborn County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
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. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Dearborn County has been designated as attainment or unclassifiable (except for Lawrenceburg Township) for ozone. Therefore, VOC emissions and NOx 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.

(b) The portion of Dearborn County in which this source is located has been classified as attainment or unclassifiable in Indiana for the remaining criteria pollutants. 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.

Source Status

Existing Source PSD 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	66
PM-10	17.1
SO_2	0
VOC	0.2
CO	1.8
NO_x	7.4
Single HAP	0.0
Combination HAPs	0.0

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

(b) These emissions were based on CP- 029-9354-00024, issued on June 8, 1998.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)
This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) Each criteria pollutant is less than 100 tons per year,

(b) A single hazardous air pollutant (HAP) is less than 10 tons per year, and

(c) Any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

(a) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.300, Subpart DD) are not included in the permit for the grain bucket elevators because this rule applies to affected facilities at any grain terminal elevator or grain storage elevator that were constructed after August 3, 1978. Since this source is a grain elevator with a permanent storage capacity of 600,000 U.S. bushels per year, which is less than 2.5 million U.S. bushels and it is not located at a wheat flour, wet corn, dry corn, or rice mill or a soybean extraction plant, it does not meet the definition of a grain terminal elevator or a grain storage elevator.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants for Marine Tank Vessel Loading (40 CFR 63.560, Subpart Y) are not included in the permit for the barge loading operations because they are not located at a major source of hazardous air pollutants pursuant to 40 CFR Part 63.2.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)
Although the source was constructed after the August 7, 1977 PSD rule applicability date it is not considered a major source because it does not have the potential to emit 250 tons per year or more of any criteria pollutant and it is not one of the 28 listed source categories. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 do not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). There are no facilities with an uncontrolled PTE of 10 tons per year of any single HAP and 25 tons per year of the combination of HAPs that have been constructed or reconstructed since July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply to this source.

326 IAC 2-6 (Emission Reporting)
Since this source is complying with 326 IAC 2-6.1 and is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is not subject to 326 IAC 2-6 (Emission Reporting).

326 IAC 5-1 (Opacity Limitations)
This source is not subject to the requirements of 326 IAC 5-1 (Opacity Limitations) because opacity limitations have been established for this source pursuant to 326 IAC 6-1-2.

326 IAC 6-1-2 (Nonattainment Area Limitations)

This source is subject to the requirements of 326 IAC 6-1-2 because the source is located in Dearborn County, which is one of the specifically listed counties under 326 IAC 6-1-7 and has potential particulate matter emissions greater than 100 tons per year. Pursuant to 326 IAC 6-1-2(d), since this source is a grain elevator with a permanent storage capacity of 600,000 U.S. bushels per year, it is only subject to the requirements of 326 IAC 6-1-2(d)(2). Pursuant to this rule, the following shall apply:

(a) The source shall provide for good housekeeping and maintenance procedures which is defined as those practices which would be followed by a prudent management in controlling, regulating, and maintaining clean and safe conditions of buildings and grounds. In particular, these practices are required to minimize the opportunity for particulate matter to become airborne and leave the property.

(b) Good housekeeping practices shall be conducted in the following areas or operations:

(1) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floors, decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentration; and grain driers with respect to accumulated particulate matter.

(2) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.

(3) Dust from driveways, access roads, and other areas of travel shall be controlled.

(4) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(c) Good equipment maintenance will be those procedures, which eliminate or minimize emissions from equipment or a system caused by:

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

(d) To insure the above good housekeeping and maintenance procedures, emissions from the affected areas, operations, equipment and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

State Rule Applicability – Individual Facilities

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

Pursuant to CP 029-9354-00024, issued on June 8, 1998, the particulate from the one (1) grain dryer, the seven (7) storage bins, the three (3) grain dump sheds and the grain handling operations shall be limited by the following:

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

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

$E = 55.0(57.61^{0.11}) - 40 = 45.9$ lbs/hr (201.1 tons/yr) for each operation (grain receiving, grain drying, bin loading, and grain shipping).

Total uncontrolled potential PM emissions from each of the grain drying, receiving, shipping, and loading operations are less than the allowable emission rate of 45.9 lbs/hr (see Appendix A, Page 2 of 4), therefore, the one (1) grain dryer, the seven (7) storage bins, the three (3) grain dump sheds and the grain handling operations will comply with the requirements of 326 IAC 6-3-2. The baghouses shall be operated at all times when the grain dump pits #1, #2 and #3 are in operation.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

Conclusion

The operation of this whole grain handling operation shall be subject to the conditions of the Minor Source Operating Permit 029-20284-00024.

Appendix A: Emission Calculations
Emissions Summary

Company Name: Consolidated Grain & Barge Company
Adress City IN Zip: 210 George Street, Aurora, Indiana 47001
MSOP No.: 029-20284-00024
Reviewer: Seema Roy

Uncontrolled Potential Emissions

	Emissions Generating Activity		
Pollutant	Grain Handling and Drying	Natural Gas Combustion	**TOTAL**
PM	202.34	0.10	202.4
PM-10	50.59	0.40	51.0
SO2	0.00	0.03	0.0
NOx	0.00	5.26	5.3
VOC	0.00	0.29	0.3
CO	0.00	4.42	4.4
HAPs	0.00	0.10	0.1

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions

	Emissions Generating Activity		
Pollutant	Grain Handling and Drying	Natural Gas Combustion	**TOTAL**
PM	16.00	0.10	16.1
PM-10	4.00	0.40	4.4
SO2	0.00	0.03	0.0
NOx	0.00	5.26	5.3
VOC	0.00	0.29	0.3
CO	0.00	4.42	4.4
HAPs	0.00	0.10	0.1

Total emissions based on rated capacity at 8,760 hours/year.

Appendix A: Emissions Calculations
Grain Elevator

Company Name: Consolidated Grain & Barge Company
Adress City IN Zip: 210 George Street, Aurora, Indiana 47001
MSOP No.: 029-20284-00024
Reviewer: Seema Roy

Uncontrolled Potential Emissions					
	GRAIN RECEIVING (truck)	GRAIN DRYING	BIN LOADING	SHIPPING (rail or barge)	**TOTAL**
Maximum Annual Corn Throughput (tons/yr)	504,000	5,231	199,800	504,000	
Maximum Annual Soybean Throughput (tons/y	195,476	0	117,000	195,476	
Maximum Annual Wheat Throughput (tons/yr)	12,855	0	7,713	12,855	
Corn PM Emission Factor in lb/ton	0.1500	0.2200	0.0500	0.4000	
Soybean PM Emission Factor in lb/ton	0.1500	0.2200	0.0500	0.4000	
Wheat PM Emission Factor in lb/ton	0.0600	0.0880	0.0200	0.1600	
Corn PM10 Emission Factor in lb/ton	0.0375	0.0550	0.0125	0.1000	
Soybean PM10 Emission Factor in lb/ton	0.0375	0.0550	0.0125	0.1000	
Wheat PM10 Emission Factor in lb/ton	0.0150	0.0220	0.0050	0.0400	
Corn Dustiness Ratio (DR)	2.5	2.5	2.5	2.5	
Soybean Dustiness Ration (DR)	2.5	2.5	2.5	2.5	
Wheat Dustiness Ratio (DR)	1.0	1.0	1.0	1.0	
Potential PM Emissions (tons/yr)	52.85	0.58	8.00	140.92	202.34
Potential PM10 Emissions (tons/yr)	13.21	0.14	2.00	35.23	50.59

Controlled Potential Emissions					
	GRAIN RECEIVING	GRAIN DRYING	BIN LOADING	SHIPPING	**TOTAL**
Potential PM Emissions (tons/yr)	52.85	0.58	8.00	140.92	
Potential PM10 Emissions (tons/yr)	13.21	0.14	2.00	35.23	
Control Equipment (1)	enclosure & baghouse	N/A	enclosure	enclosure	
Control Efficiency	99.00%	0.00%	90.00%	90.00%	
Controlled PM Emissions (tons/yr)	0.53	0.58	0.80	14.09	16.00
Controlled PM10 Emissions (tons/yr)	0.13	0.14	0.20	3.52	4.00

Methodology:
Emission factors are from U.S.EPA's AP-42, Interim Section 9.9.1, 11/95, Table 9.9.1-2 (Interim Uncontrolled Particulate Emission Factors for Grain Elevators)
Potential PM/PM10 Emissions (tons/yr) = Annual Throughput (tons/yr) * PM/PM10 Emission Factor (lb/ton) * Dustiness Ratio * (1 ton/2000 lbs)
Controlled PM/PM10 Emissions (tons/yr) = Potential Uncontrolled PM/PM10 Emissions (tons/yr) * (1 - Control Efficiency)

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

Grain Dryer

Company Name: **Consolidated Grain & Barge Company**
Adress City IN Zip: **210 George Street, Aurora, Indiana 47001**
MSOP No.: **029-20284-00024**
Reviewer: **Seema Roy**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
12.0	105.1

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.10	0.40	0.03	5.26	0.29	4.42

*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

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

Grain Dryer

Company Name: **Consolidated Grain & Barge Company**
Adress City IN Zip: **210 George Street, Aurora, Indiana 47001**
MSOP No.: **029-20284-00024**
Reviewer: **Seema Roy**

HAPs - Organics

	Benzene	e	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-04	6.307E-05	3.942E-03	9.461E-02	1.787E-04

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-05	5.782E-05	7.358E-05	1.997E-05	1.104E-04

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.