



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: June 30, 2005
RE: ADM/Growmark / MSOP 147-20450-00055
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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**NEW SOURCE CONSTRUCTION
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**ADM/Growmark
609 N. State Road 66
Rockport, Indiana 47635**

(herein known as the Permittee) is hereby authorized to construct and 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 147-20450-00055	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 30, 2005 Expiration Date: June 30, 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 country grain elevator.

Authorized Individual:	V.P. U.S. Grain Operations and Engineering
Source Address:	609 N. State Road 66, Rockport, IN 47635
Mailing Address:	1001 North Brush College Road, Decatur, IL 62521
General Source Phone:	812-649-9311
SIC Code:	5153
County Location:	Spencer
Source Location Status:	Nonattainment area for PM _{2.5} Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) One (1) truck receiving operation, identified as EP-1, constructed in December 2002, equipped with baffles for particulate control, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
 - (1) One (1) receiving pit, identified as Dump #1, constructed in December 2002, capacity: 18,000 bushels per hour.
 - (2) One (1) receiving pit, identified as Dump #2, constructed in December 2002, capacity: 25,000 bushels per hour.
 - (3) One (1) receiving pit, identified as Dump #3, constructed in December 2002, capacity: 25,000 bushels per hour.
 - (4) One (1) receiving pit, identified as receiving pit #2, to be constructed in 2005, equipped with baffles for particulate control, capacity: 18,000 bushels per hour.
- (b) One (1) internal handling operation, identified as EP-2, constructed in December 2002, equipped with enclosures for particulate control, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
 - (1) One (1) drag conveyor, identified as Dump #1 Drag Conveyor, constructed in December 2002, capacity: 18,000 bushels per hour.
 - (2) One (1) receiving leg, identified as Receiving Leg #1, constructed in December 2002, capacity: 18,000 bushels per hour.

- (3) One (1) bin 10 reclaim conveyor, identified as Bin 10 Reclaim Conveyor, constructed in December 2002, capacity: 20,000 bushels per hour.
 - (4) One (1) bin 20 reclaim, identified as Bin 20 Reclaim, constructed in December 2002, capacity: 15,000 bushels per hour.
 - (5) One (1) bin 30 reclaim, identified as Bin 30 Reclaim, constructed in December 2002, capacity: 20,000 bushels per hour.
 - (6) Two (2) storage bin reclaim conveyors, identified as New Reclaim Conveyors, to be constructed in 2005, capacity: 20,000 bushels per hour, each.
 - (7) One (1) storage bin fill conveyor, identified as New Fill Conveyor, to be constructed in 2005, capacity: 18,000 bushels per hour.
 - (8) One (1) receiving pit conveyor, identified as Receiving Pit Conveyor, to be constructed in 2005, capacity: 18,000 bushels per hour.
 - (9) One (1) receiving leg, identified as New Receiving Leg, to be constructed in 2005, capacity: 18,000 bushels per hour.
 - (10) One (1) enclosed grain distributor, identified as Grain Distributor, to be constructed in 2005, capacity: 18,000 bushels per hour.
- (c) One (1) storage area, identified as EP-5, constructed in December 2002, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
- (1) Two (2) storage bins, identified as Bin 10 and Bin 30, constructed in December 2002, respectively, capacity: 111,000 bushels, each.
 - (2) One (1) storage bin, identified as Bin 20, constructed in December 2002, capacity: 24,000 bushels.
 - (3) One (1) storage bin, identified as Bin 25, to be constructed in 2005, capacity: 450,000 bushels.
 - (4) One (1) hopper bin, identified as Bin 15, to be constructed in 2005, capacity: 30,900 bushels.
- (d) One (1) barge shipping area, identified as EP-3, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
- (1) One (1) shipping conveyor, identified as Shipping Conveyor, constructed in December 2002, capacity: 25,000 bushels per hour.
 - (2) One (1) barge conveyor, identified as Barge Conveyor, capacity: 25,000 bushels per hour.
 - (3) One (1) barge loadout, identified as Barge Loadout, capacity: 25,000 bushels per hour.
- (e) One (1) truck shipping area, identified as EP-4, constructed in December 2002, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
- (1) One (1) bin 20 sidedraw truck loadout, identified as Bin 20 Sidedraw Truck Loadout, constructed in December 2002, capacity: 6,000 bushels per hour.

- (2) One (1) leg spout truck loadout, identified as Leg Spout Truck Loadout, constructed in December 2002, capacity: 18,000 bushels per hour.
- (3) One (1) bin 15 sidedraw truck loadout, identified as Bin 15 Sidedraw Truck Loadout, to be constructed in 2005, capacity: 6,000 bushels per hour.
- (4) One (1) bin 25 sidedraw truck loadout, identified as Bin 25 Sidedraw Truck Loadout, to be constructed in 2005, capacity: 6,000 bushels per hour.
- (5) One (1) bin 10 sidedraw truck loadout, identified as Bin 10 Sidedraw Truck Loadout, constructed in December 2002, capacity: 6,000 bushels 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 construct 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 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 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.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction 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.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and 326 IAC 2-2 and an Operation Permit Validation Letter is issued.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 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
Indianapolis, Indiana 46204
- (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.9 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
Indianapolis, Indiana 46204

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.10 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
Indianapolis, Indiana 46204

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.11 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.12 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.13 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.

B.14 Credible Evidence [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

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 one hundred (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 construct and** operate may be revoked for any of the following causes:

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the 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.7 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.8 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.9 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.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.

Record Keeping and Reporting Requirements

C.11 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.12 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.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-5] [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
Indianapolis, Indiana 46204
- (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 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) truck receiving operation, identified as EP-1, constructed in December 2002, equipped with baffles for particulate control, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
 - (1) One (1) receiving pit, identified as Dump #1, constructed in December 2002, capacity: 18,000 bushels per hour.
 - (2) One (1) receiving pit, identified as Dump #2, constructed in December 2002, capacity: 25,000 bushels per hour.
 - (3) One (1) receiving pit, identified as Dump #3, constructed in December 2002, capacity: 25,000 bushels per hour.
 - (4) One (1) receiving pit, identified as receiving pit #2, to be constructed in 2005, equipped with baffles for particulate control, capacity: 18,000 bushels per hour.
- (b) One (1) internal handling operation, identified as EP-2, constructed in December 2002, equipped with enclosures for particulate control, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
 - (1) One (1) drag conveyor, identified as Dump #1 Drag Conveyor, constructed in December 2002, capacity: 18,000 bushels per hour.
 - (2) One (1) receiving leg, identified as Receiving Leg #1, constructed in December 2002, capacity: 18,000 bushels per hour.
 - (3) One (1) bin 10 reclaim conveyor, identified as Bin 10 Reclaim Conveyor, constructed in December 2002, capacity: 20,000 bushels per hour.
 - (4) One (1) bin 20 reclaim, identified as Bin 20 Reclaim, constructed in December 2002, capacity: 15,000 bushels per hour.
 - (5) One (1) bin 30 reclaim, identified as Bin 30 Reclaim, constructed in December 2002, capacity: 20,000 bushels per hour.
 - (6) Two (2) storage bin reclaim conveyors, identified as New Reclaim Conveyors, to be constructed in 2005, capacity: 20,000 bushels per hour, each.
 - (7) One (1) storage bin fill conveyor, identified as New Fill Conveyor, to be constructed in 2005, capacity: 18,000 bushels per hour.
 - (8) One (1) receiving pit conveyor, identified as Receiving Pit Conveyor, to be constructed in 2005, capacity: 18,000 bushels per hour.
 - (9) One (1) receiving leg, identified as New Receiving Leg, to be constructed in 2005, capacity: 18,000 bushels per hour.
 - (10) One (1) enclosed grain distributor, identified as Grain Distributor, to be constructed in 2005, capacity: 18,000 bushels per hour.

- (c) One (1) storage area, identified as EP-5, constructed in December 2002, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
- (1) Two (2) storage bins, identified as Bin 10 and Bin 30, constructed in December 2002, capacity: 111,000 bushels, each.
 - (2) One (1) storage bin, identified as Bin 20, constructed in December 2002, capacity: 24,000 bushels.
 - (3) One (1) storage bin, identified as Bin 25, to be constructed in 2005, capacity: 450,000 bushels.
 - (4) One (1) hopper bin, identified as Bin 15, to be constructed in 2005, capacity: 30,900 bushels.
- (d) One (1) barge shipping area, identified as EP-3, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
- (1) One (1) shipping conveyor, identified as Shipping Conveyor, constructed in December 2002, capacity: 25,000 bushels per hour.
 - (2) One (1) barge conveyor, identified as Barge Conveyor, capacity: 25,000 bushels per hour.
 - (3) One (1) barge loadout, identified as Barge Loadout, capacity: 25,000 bushels per hour.
- (e) One (1) truck shipping area, identified as EP-4, constructed in December 2002, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
- (1) One (1) bin 20 sidedraw truck loadout, identified as Bin 20 Sidedraw Truck Loadout, constructed in December 2002, capacity: 6,000 bushels per hour.
 - (2) One (1) leg spout truck loadout, identified as Leg Spout Truck Loadout, constructed in December 2002, capacity: 18,000 bushels per hour.
 - (3) One (1) bin 15 sidedraw truck loadout, identified as Bin 15 Sidedraw Truck Loadout, to be constructed in 2005, capacity: 6,000 bushels per hour.
 - (4) One (1) bin 25 sidedraw truck loadout, identified as Bin 25 Sidedraw Truck Loadout, to be constructed in 2005, capacity: 6,000 bushels per hour.
 - (5) One (1) bin 10 sidedraw truck loadout, identified as Bin 10 Sidedraw Truck Loadout, constructed in December 2002, capacity: 6,000 bushels 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 Particulate [326 IAC 6-3-2]

- (a) The particulate (PM) emissions from the one (1) receiving pit, identified as Dump #1, associated with the truck receiving operation, identified as EP-1, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels).

- (b) The particulate (PM) emissions from the one (1) receiving pit, identified as Dump #2, associated with the truck receiving operation, identified as EP-1, shall be limited to 73.9 pounds per hour when operating at a process weight rate of 1,500,000 pounds per hour (25,000 bushels).
- (c) The particulate (PM) emissions from the one (1) receiving pit, identified as Dump #3, associated with the truck receiving operation, identified as EP-1, shall be limited to 73.9 pounds per hour when operating at a process weight rate of 1,500,000 pounds per hour (25,000 bushels).
- (d) The particulate (PM) emissions from the one (1) receiving pit, identified as Receiving Pit #2, associated with the one (1) truck receiving operation, identified as EP-1, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels).
- (e) The particulate (PM) emissions from the one (1) drag conveyor, identified as Dump #1 Drag Conveyor, associated with the internal handling operation, identified as EP-2, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels).
- (f) The particulate (PM) emissions from one (1) receiving leg, identified as Receiving Leg #1, associated with the internal handling operations, identified as EP-2, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels).
- (g) The particulate (PM) emissions from the one (1) bin 10 reclaim conveyor, identified as Bin 10 Reclaim Conveyor, associated with the internal handling operations, identified as EP-2, shall be limited to 71.2 pounds per hour when operating at a process weight rate of 1,200,000 pounds per hour (20,000 bushels).
- (h) The particulate (PM) emissions from the one (1) bin 20 reclaim, identified as Bin 20 Reclaim, associated with the internal handling operations, identified as EP-2, shall be limited to 67.7 pounds per hour when operating at a process weight rate of 900,000 pounds per hour (15,000 bushels).
- (i) The particulate (PM) emissions from the one (1) bin 30 reclaim, identified as Bin 30 Reclaim, associated with the internal handling operations, identified as EP-2, shall be limited to 71.2 pounds per hour when operating at a process weight rate of 1,200,000 pounds per hour (20,000 bushels).
- (j) The particulate (PM) emissions from the two (2) storage bin reclaim conveyors, identified as New Reclaim Conveyors, associated with the internal handling operation, identified as EP-2, shall be limited to 71.2 pounds per hour, each, when operating at a process weight rate of 1,200,000 pounds per hour (20,000 bushels), each.
- (k) The particulate (PM) emissions from the one (1) storage bin fill conveyor, identified as New Fill Conveyor, associated with the internal handling operation, identified as EP-2, shall be limited to 69.9 pounds per hour, when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels).
- (l) The particulate (PM) emissions from one (1) receiving pit conveyor, identified as Receiving Pit Conveyor, associated with the internal handling operations, identified as EP-2, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels).

- (m) The particulate (PM) emissions from one (1) receiving leg, identified as New Receiving Leg, associated with the internal handling operations, identified as EP-2, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels).
- (n) The particulate (PM) emissions from one (1) enclosed grain distributor, identified as Grain Distributor, associated with the internal handling operations, identified as EP-2, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels).
- (o) The particulate (PM) emissions from the two (2) storage bins, identified as Bin 10 and Bin 30, associated with the one (1) storage area, identified as EP-5, shall be limited to 87.2 pounds per hour, each, when operating at a process weight rate of 4,080,000 pounds per hour (68,000 bushels), each.
- (p) The particulate (PM) emissions from the one (1) storage bin, identified as Bin 20, associated with the one (1) storage area, identified as EP-5, shall be limited to 87.2 pounds per hour when operating at a process weight rate of 4,080,000 pounds per hour (68,000 bushels).
- (q) The particulate (PM) emissions from the one (1) storage bin, identified as Bin 25, associated with the one (1) storage area, identified as EP-5, shall be limited to 87.2 pounds per hour when operating at a process weight rate of 4,080,000 pounds per hour (68,000 bushels).
- (r) The particulate (PM) emissions from the one (1) hopper bin, identified as Bin 15, associated with the one (1) storage area, identified as EP-5, shall be limited to 87.2 pounds per hour when operating at a process weight rate of 4,080,000 pounds per hour (68,000 bushels).
- (s) The particulate (PM) emissions from the one (1) shipping conveyor, identified as Shipping Conveyor, the one (1) barge conveyor, identified as Barge Conveyor, and the one (1) barge loadout, identified as Barge Loadout, associated with the one (1) barge shipping area, identified as EP-3, shall be limited to 73.9 pounds per hour, each, when operating at a process weight rate of 1,500,000 pounds per hour (25,000 bushels), each.
- (t) The particulate (PM) emissions from the one (1) bin 10 sidedraw loadout, identified as Bin 10 Sidedraw Loadout, the one (1) bin 15 sidedraw loadout, identified as Bin 15 Sidedraw Loadout, the one (1) bin 20 sidedraw loadout, identified as Bin 20 Sidedraw Loadout, and the one (1) bin 25 sidedraw loadout, identified as Bin 25 Sidedraw Loadout associated with the one (1) truck shipping area, identified as EP-4, shall be limited to 57.4 pounds per hour, each, when operating at a process weight rate of 360,000 pounds per hour (6,000 bushels), each.
- (u) The particulate (PM) emissions from the one (1) leg sprout truck loadout, identified as Leg Sprout Truck Loadout, associated with the one (1) truck shipping area, identified as EP-4, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels).

The pounds per hour limitations above were calculated with 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:

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

D.1.2 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 the three (3) loadout dumps, identified as Dump #1, Dump #2 and Dump #3, and their control devices.

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the baffles for particulate control shall be in operation and control emissions from the three (3) receiving pits, identified as Dump #1, Dump #2 and Dump #3, and the one (1) receiving pit, identified as Receiving Pit #2, at all times that the three (3) receiving pits, identified as Dump #1, Dump #2 and Dump #3, and the one (1) receiving pit, identified as Receiving Pit #2, are in operation.

Compliance Monitoring Requirements

D.1.4 Monitoring

To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. 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.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain a log of weekly inspections of the baffle panels, and those 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.

**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:	ADM/Growmark
Address:	609 N. State Road
City:	Rockport, Indiana 47635
Phone #:	812-649-9311
MSOP #:	147-20450-00055

I hereby certify that **ADM/Growmark** is still in operation.
 no longer in operation.

I hereby certify that **ADM/Growmark** is in compliance with the requirements of MSOP **147-20450-00055**.
 not in compliance with the requirements of MSOP **147-20450-00055**.

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 PERM LIMIT OF _____

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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 New Source Construction
and Minor Source Operating Permit

Source Background and Description

Source Name: ADM/Growmark
Source Location: 609 N. State Road 66, Rockport, IN 47635
County: Spencer
SIC Code: 5153
Operation Permit No.: 147-20450-00055
Permit Reviewer: Craig J. Friederich

The Office of Air Quality (OAQ) has reviewed an application from ADM/Growmark relating to the operation of a country grain elevator.

History

This country grain elevator has been operating under the provisions of Permit By Rule PBR 147-13940-00042 issued on April 10, 2001 to Mulzer Crushed Stone. It has been determined that the operation of the country grain elevator for ADM/Growmark should be permitted as a separate source. ADM/Growmark leases the land to use the property owned by Mulzer Crushed Stone. Mulzer Crushed Stone receives no fee from any profit gained by ADM/Growmark. ADM/Growmark has been given a new source identification number and is being permitted separately as a Minor Source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) truck receiving operation, identified as EP-1, constructed in December 2002, equipped with baffles for particulate control, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
 - (1) One (1) receiving pit, identified as Dump #1, constructed in December 2002, capacity: 18,000 bushels per hour.
 - (2) One (1) receiving pit, identified as Dump #2, constructed in December 2002, capacity: 25,000 bushels per hour.
 - (3) One (1) receiving pit, identified as Dump #3, constructed in December 2002, capacity: 25,000 bushels per hour.
- (b) One (1) internal handling operation, identified as EP-2, constructed in December 2002, equipped with enclosures for particulate control, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
 - (1) One (1) drag conveyor, identified as Dump #1 Drag Conveyor, constructed in December 2002, capacity: 18,000 bushels per hour.
 - (2) One (1) receiving leg, identified as Receiving Leg #1, constructed in December 2002, capacity: 18,000 bushels per hour.
 - (3) One (1) bin 10 reclaim conveyor, identified as Bin 10 Reclaim Conveyor, constructed in December 2002, capacity: 20,000 bushels per hour.

- (4) One (1) bin 20 reclaim, identified as Bin 20 Reclaim, constructed in December 2002, capacity: 15,000 bushels per hour.
- (5) One (1) bin 30 reclaim, identified as Bin 30 Reclaim, constructed in December 2002, capacity: 20,000 bushels per hour.
- (c) One (1) storage area, identified as EP-5, constructed in December 2002, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
 - (1) Two (2) storage bins, identified as Bin 10 and Bin 30, constructed in December 2002, capacity: 111,000 bushels, each.
 - (2) One (1) storage bin, identified as Bin 20, constructed in December 2002, capacity: 24,000 bushels.
- (d) One (1) barge shipping area, identified as EP-3, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
 - (1) One (1) shipping conveyor, identified as Shipping Conveyor, constructed in December 2002, capacity: 25,000 bushels per hour.
 - (2) One (1) barge conveyor, identified as Barge Conveyor, capacity: 25,000 bushels per hour.
 - (3) One (1) barge loadout, identified as Barge Loadout, capacity: 25,000 bushels per hour.
- (e) One (1) truck shipping area, identified as EP-4, constructed in December 2002, capacity: 20,000,000 bushels or 600,000 tons per year, consisting of the following equipment:
 - (1) One (1) bin 20 sidedraw truck loadout, identified as Bin 20 Sidedraw Truck Loadout, constructed in December 2002, capacity: 6,000 bushels per hour.
 - (2) One (1) leg spout truck loadout, identified as Leg Spout Truck Loadout, constructed in December 2002, capacity: 18,000 bushels per hour.
 - (3) One (1) bin 10 sidedraw truck loadout, identified as Bin 10 Sidedraw Truck Loadout, constructed in December 2002, capacity: 6,000 bushels per hour.

New Emission Units and Pollution Control Equipment

The application includes information relating to the prior approval for the construction and operation of the following new equipment:

- (a) One (1) storage bin, identified as Bin 25, associated with the one (1) storage area, identified as EP-5, to be constructed in 2005, capacity: 450,000 bushels.
- (b) One (1) hopper bin, identified as Bin 15, associated with the one (1) storage area, identified as EP-5, to be constructed in 2005, capacity: 30,900 bushels.
- (c) Two (2) storage bin reclaim conveyors, identified as New Reclaim Conveyors, associated with the one (1) internal handling operation, identified as EP-2, to be constructed in 2005, capacity: 20,000 bushels per hour, each.

- (d) One (1) storage bin fill conveyor, identified as New Fill Conveyor, associated with the one (1) internal handling operation, identified as EP-2, to be constructed in 2005, capacity: 20,000 bushels per hour.
- (e) One (1) receiving pit, identified as receiving pit #2, associated with the one (1) truck receiving operation, identified as EP-1, to be constructed in 2005, equipped with baffles for particulate control, capacity: 18,000 bushels per hour.
- (f) One (1) receiving pit conveyor, identified as Receiving Pit Conveyor, associated with the one (1) internal handling operation, identified as EP-2, to be constructed in 2005, capacity: 18,000 bushels per hour.
- (g) One (1) receiving leg, identified as New Receiving Leg, associated with the one (1) internal handling operation, identified as EP-2, to be constructed in 2005, capacity: 18,000 bushels per hour.
- (h) One (1) enclosed grain distributor, identified as Grain Distributor, associated with the one (1) internal handling operation, identified as EP-2, to be constructed in 2005, capacity: 18,000 bushels per hour.
- (i) One (1) bin 15 sidedraw truck loadout, identified as Bin 15 Sidedraw Truck Loadout, associated with the one (1) truck shipping area, identified as EP-4, to be constructed in 2005, capacity: 6,000 bushels per hour.
- (j) One (1) bin 25 sidedraw truck loadout, identified as Bin 25 Sidedraw Truck Loadout, associated with the one (1) truck shipping area, identified as EP-4, to be constructed in 2005, capacity: 6,000 bushels per hour.

Existing Approvals

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

PBR 147-13940-00042 issued on April 10, 2001

None of the provisions of this permit are being carried over at this time. The source no longer will be limited to a total annual grain throughput of less than 8,000,000 bushels. The requirements of 326 IAC 2-11 (Permit By Rule) are no longer applicable to this source.

Enforcement Issue

- (a) IDEM is aware that the grain elevator is not in compliance with the following emission limitation:

326 IAC 2-11 (Permit By Rule)

Pursuant to 326 IAC 2-11 (Permit By Rule), the total annual grain throughput at the grain elevator shall be limited to less than 8,000,000 bushels
- (b) IDEM is reviewing this matter and has taken appropriate action.

Stack Summary

There are no process stacks associated with any facilities at this source.

Recommendation

The staff recommends to the Commissioner that the construction and 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.

An application for the purposes of this review was received on December 6, 2004, with additional information received on April 7, 2005 and April 27, 2005.

Emission Calculations

See pages 1 through 3 of 3 of Appendix A of this document for detailed emission calculations.

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, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	166
PM ₁₀	49.4
SO ₂	--
VOC	--
CO	--
NO _x	--

HAPs	Potential to Emit (tons/yr)
Total	--

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ is less than one hundred (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
 - (1) This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, and there are no applicable New Source Performance Standards that were in effect on August 7, 1980. The source is not subject to 40 CFR Part 60, Subpart DD, Standards of Performance for Grain Elevators, because it is a Grain Terminal Elevator with a permanent storage capacity less than 2.5 million

U.S. bushels. Therefore, the fugitive particulate matter (PM) emissions are not counted toward determination of PSD applicability.

- (2) The National Grain and Feed Association has obtained a ruling from the U.S. EPA regarding fugitive emissions from grain elevators. In a letter from Edward J. Lillis, Chief of the U.S. EPA Permit Programs Branch, dated October 14, 1994, to Thomas C. O'Conner, Director of Technical Service of the Association, the Agency stated that grain elevators below the applicable facility size as defined in 40 CFR Part 60, Subpart DD need not consider fugitive emissions when determining major source status.

County Attainment Status

The source is located in Spencer County.

Pollutant	Status
PM _{2.5}	Non-Attainment
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 (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Spencer County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (b) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Spencer County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment 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 PM_{2.5} emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Spencer County (Ohio Township) has been classified as attainment or unclassifiable in Indiana for all 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 - Entire Source section of this document.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on the U.S. EPA's Calculating Potential to Emit and Other Guidance for Grain Handling Facilities, November 14, 1995):

Pollutant	Emissions (tons/yr)
PM	87.5
PM ₁₀	20.6
SO ₂	--
VOC	--
CO	--
NO _x	--
Single HAP	--
Combination HAPs	--

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or greater, no non-attainment regulated pollutant is emitted at a rate of one-hundred (100) tons per year or greater, and it is not in one of the twenty-eight (28) listed source categories.
- (b) Emissions were based on Appendix A of this document.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 147-20450-00055, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) criteria pollutant is less than one-hundred (100) tons per year,
- (b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and
- (c) the combination of HAPs is less than twenty-five (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) This country grain elevator is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.300, Subpart DD because it has a permanent storage capacity less than 2.5 million U.S. bushels. The maximum storage capacity of the source is 726,900 U.S. bushels.
- (b) 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 2-2 (Prevention of Significant Deterioration (PSD))

The unrestricted potential emissions of each attainment criteria pollutant are less than two-hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County with the potential to emit greater than twenty-five (25) tons per year of NO_x, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 5-1 (Opacity Limitations)

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

State Rule Applicability – Individual Facilities

326 IAC 2-3 (Emission Offset)

This source does not have the potential to emit more than 100 tons per year of PM₁₀. Therefore, the potential to emit PM_{2.5} is less than 100 tons per year, and this source is not a major source due to PM_{2.5} emissions.

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

Each process at the grain elevator source has a process weight in excess of sixty thousand (60,000) pounds per hour. All processing is assumed to be corn, which has a weight of 60 pounds per bushel. The maximum allowable particulate emission from each process shall be limited by the following:

$$E = 55 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour, and} \\ P = \text{process weight rate in tons per hour.}$$

- (a) The particulate (PM) emissions from the one (1) receiving pit, identified as Dump #1, associated with the truck receiving operation, identified as EP-1, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels). Emissions calculations based on AP-42 indicate that uncontrolled emissions from Dump #1 will be 0.180 pounds of particulate per ton of grain processed, or 97.2 pounds per hour. Therefore, this facility is not in compliance without controls. However, the facility is equipped with baffles to control particulate during unloading operations, with a control efficiency of 60%. Therefore, particulate emissions after controls

are expected to be 38.8 pounds per hour. These baffles shall be in operation at all times Dump #1 is in operation in order to comply with this limit.

- (b) The particulate (PM) emissions from the one (1) receiving pit, identified as Dump #2, associated with the truck receiving operation, identified as EP-1, shall be limited to 73.9 pounds per hour when operating at a process weight rate of 1,500,000 pounds per hour (25,000 bushels). Emissions calculations based on AP-42 indicate that uncontrolled emissions from Dump #2 will be 0.180 pounds of particulate per ton of grain processed, or 135 pounds per hour. Therefore, this facility is not in compliance without controls. However, the facility is equipped with baffles to control particulate during unloading operations, with a control efficiency of 60%. Therefore, particulate emissions after controls are expected to be 54.0 pounds per hour. These baffles shall be in operation at all times Dump #2 is in operation in order to comply with this limit.
- (c) The particulate (PM) emissions from the one (1) receiving pit, identified as Dump #3, associated with the truck receiving operation, identified as EP-1, shall be limited to 73.9 pounds per hour when operating at a process weight rate of 1,500,000 pounds per hour (25,000 bushels). Emissions calculations based on AP-42 indicate that uncontrolled emissions from Dump #3 will be 0.180 pounds of particulate per ton of grain processed, or 135 pounds per hour. Therefore, this facility is not in compliance without controls. However, the facility is equipped with baffles to control particulate during unloading operations, with a control efficiency of 60%. Therefore, particulate emissions after controls are expected to be 54.0 pounds per hour. These baffles shall be in operation at all times Dump #3 is in operation in order to comply with this limit.
- (d) The particulate (PM) emissions from the one (1) receiving pit, identified as Receiving Pit #2, associated with the one (1) truck receiving operation, identified as EP-1, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels). Emissions calculations based on AP-42 indicate that uncontrolled emissions from the one (1) receiving pit will be 0.180 pounds of particulate per ton of grain processed, or 97.2 pounds per hour. Therefore, this facility is not in compliance without controls. However, the facility is equipped with baffles to control particulate during unloading operations, with a control efficiency of 60%. Therefore, particulate emissions after controls are expected to be 38.9 pounds per hour. These baffles shall be in operation at all times Receiving Pit #2 is in operation in order to comply with this limit.
- (e) The particulate (PM) emissions from the one (1) drag conveyor identified as Dump #1 Drag Conveyor, associated with the internal handling operation, identified as EP-2, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels). Emissions calculations based on AP-42 indicate that uncontrolled emissions from the one (1) drag conveyor will be 0.061 pounds of particulate per ton of grain processed, or 32.9 pounds per hour. Therefore, this facility is in compliance without controls.
- (f) The particulate (PM) emissions from the one (1) receiving leg, identified as Receiving Leg #1, associated with the internal handling operations, identified as EP-2, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels). Emissions calculations based on AP-42 indicate that emissions from the one (1) receiving leg will be 0.061 pounds of particulate per ton of grain processed, or 32.9 pounds per hour. Therefore, this facility is in compliance without controls.
- (g) The particulate (PM) emissions from the one (1) bin 10 reclaim conveyor, identified as Bin 10 Reclaim Conveyor, associated with the internal handling operations, identified as EP-2, shall be limited to 71.2 pounds per hour when operating at a process weight rate of 1,200,000 pounds per hour (20,000 bushels). Emissions calculations based on AP-42

indicate that emissions from the one (1) bin 10 reclaim conveyor will be 0.061 pounds of particulate per ton of grain processed, or 36.6 pounds per hour. Therefore, this facility is in compliance without controls.

- (h) The particulate (PM) emissions from the one (1) bin 20 reclaim, identified as Bin 20 Reclaim, associated with the internal handling operations, identified as EP-2, shall be limited to 67.7 pounds per hour when operating at a process weight rate of 900,000 pounds per hour (15,000 bushels). Emissions calculations based on AP-42 indicate that emissions from the one (1) bin 20 reclaim will be 0.061 pounds of particulate per ton of grain processed, or 27.5 pounds per hour. Therefore, this facility is in compliance without controls.
- (i) The particulate (PM) emissions from the one (1) bin 30 reclaim, identified as Bin 30 Reclaim, associated with the internal handling operations, identified as EP-2, shall be limited to 71.2 pounds per hour when operating at a process weight rate of 1,200,000 pounds per hour (20,000 bushels). Emissions calculations based on AP-42 indicate that emissions from the one (1) bin 30 reclaim will be 0.061 pounds of particulate per ton of grain processed, or 36.6 pounds per hour. Therefore, this facility is in compliance without controls.
- (j) The particulate (PM) emissions from the two (2) storage bin reclaim conveyors, identified as New Reclaim Conveyors, associated with the internal handling operation, identified as EP-2, shall be limited to 71.2 pounds per hour, each, when operating at a process weight rate of 1,200,000 pounds per hour (20,000 bushels), each. Emissions calculations based on AP-42 indicate that uncontrolled emissions from the two (2) storage bin reclaim conveyors will be 0.061 pounds of particulate per ton of grain processed, or 36.6 pounds per hour. Therefore, these facilities are in compliance without controls.
- (k) The particulate (PM) emissions from the one (1) storage bin fill conveyor, identified as New Fill Conveyor, associated with the internal handling operation, identified as EP-2, shall be limited to 69.9 pounds per hour, when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels). Emissions calculations based on AP-42 indicate that uncontrolled emissions from the one (1) storage bin fill conveyor will be 0.061 pounds of particulate per ton of grain processed, or 32.9 pounds per hour. Therefore, this facility is in compliance without controls.
- (l) The particulate (PM) emissions from one (1) receiving pit conveyor, identified as Receiving Pit Conveyor, associated with the internal handling operations, identified as EP-2, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels). Emissions calculations based on AP-42 indicate that emissions from one (1) receiving pit conveyor will be 0.061 pounds of particulate per ton of grain processed, or 32.9 pounds per hour. Therefore, this facility is in compliance without controls.
- (m) The particulate (PM) emissions from one (1) receiving leg, identified as Receiving Leg, associated with the internal handling operations, identified as EP-2, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels). Emissions calculations based on AP-42 indicate that emissions from one (1) receiving leg will be 0.061 pounds of particulate per ton of grain processed, or 32.9 pounds per hour. Therefore, this facility is in compliance without controls.
- (n) The particulate (PM) emissions from one (1) enclosed grain distributor, identified as Grain Distributor, associated with the internal handling operations, identified as EP-2, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels). Emissions calculations based on AP-42

indicate that emissions from one (1) enclosed grain distributor will be 0.061 pounds of particulate per ton of grain processed, or 32.9 pounds per hour. Therefore, this facility is in compliance without controls.

- (o) The particulate (PM) emissions from the two (2) storage bins, identified as Bin 10 and Bin 30, associated with the one (1) storage area, identified as EP-5, shall be limited to 87.2 pounds per hour, each, when operating at a process weight rate of 4,080,000 pounds per hour (68,000 bushels), each. The process weight rate is based on the worst case throughput of 68,000 bushels of grain, which is the maximum amount, per hour, which can be received by truck at the facility. Emissions calculations based on AP-42 indicate that emissions from the two (2) storage bins, identified as Bin 10 and Bin 30, will be 0.025 pounds of particulate per ton of grain processed, or 51.0 pounds per hour, each. Therefore, these facilities are in compliance without controls.
- (p) The particulate (PM) emissions from the one (1) storage bin, identified as Bin 20, associated with the one (1) storage area, identified as EP-5, shall be limited to 87.2 pounds per hour when operating at a process weight rate of 4,080,000 pounds per hour (68,000 bushels). The process weight rate is based on the worst case throughput of 68,000 bushels of grain, which is the maximum amount, per hour, which can be received by truck at the facility. Emissions calculations based on AP-42 indicate that uncontrolled emissions from the one (1) storage bin will be 0.025 pounds of particulate per ton of grain processed, or 18.0 pounds per hour. Therefore, this facility is in compliance without controls.
- (q) The particulate (PM) emissions from the one (1) storage bin, identified as Bin 25, associated with the one (1) storage area, identified as EP-5, shall be limited to 87.2 pounds per hour when operating at a process weight rate of 4,080,000 pounds per hour (68,000 bushels). The process weight rate is based on the worst case throughput of 68,000 bushels of grain, which is the maximum amount, per hour, which can be received by truck at the facility. Emissions calculations based on AP-42 indicate that uncontrolled emissions from the (1) storage bin, identified as Bin 25, will be 0.025 pounds of particulate per ton of grain processed, or 51.0 pounds per hour. Therefore, this facility is in compliance without controls.
- (r) The particulate (PM) emissions from the one (1) hopper bin, identified as Bin 15, associated with the one (1) storage area, identified as EP-5, shall be limited to 87.2 pounds per hour when operating at a process weight rate of 4,080,000 pounds per hour (68,000 bushels). The process weight rate is based on the worst case throughput of 68,000 bushels of grain, which is the maximum amount, per hour, which can be received by truck at the facility. Emissions calculations based on AP-42 indicate that uncontrolled emissions from the (1) hopper bin, identified as Bin 15, will be 0.025 pounds of particulate per ton of grain processed, or 51.0 pounds per hour. Therefore, this facility is in compliance without controls.
- (s) The particulate (PM) emissions from the one (1) shipping conveyor, identified as Shipping Conveyor, the one (1) barge conveyor, identified as Barge Conveyor, and the one (1) barge loadout, identified as Barge Loadout, associated with the one (1) barge shipping area, identified as EP-3, shall be limited to 73.9 pounds per hour, each, when operating at a process weight rate of 1,500,000 pounds per hour (25,000 bushels), each. Emissions calculations based on AP-42 indicate that uncontrolled emissions from the one (1) shipping conveyor, identified as Shipping Conveyor, the one (1) barge conveyor, identified as Barge Conveyor, and the one (1) barge loadout, identified as Barge Loadout, will be 0.016 pounds of particulate per ton of grain processed, or 12.0 pounds per hour, each. Therefore, these facilities are in compliance without controls.

- (t) The particulate (PM) emissions from the one (1) bin 10 sidedraw loadout, identified as Bin 10 Sidedraw Loadout, the one (1) bin 15 sidedraw loadout, identified as Bin 15 Sidedraw Loadout, the one (1) bin 20 sidedraw loadout, identified as Bin 20 Sidedraw Loadout, and the one (1) bin 25 sidedraw loadout, identified as Bin 25 Sidedraw Loadout associated with the one (1) truck shipping area, identified as EP-4, shall be limited to 57.4 pounds per hour, each, when operating at a process weight rate of 360,000 pounds per hour (6,000 bushels), each. Emissions calculations based on AP-42 indicate that uncontrolled emissions from the one (1) bin 10 sidedraw loadout, identified as Bin 10 Sidedraw Loadout, the one (1) bin 15 sidedraw loadout, identified as Bin 15 Sidedraw Loadout, the one (1) bin 20 sidedraw loadout, identified as Bin 20 Sidedraw Loadout, and the one (1) bin 25 sidedraw loadout, identified as Bin 25 Sidedraw Loadout will be 0.086 pounds of particulate per ton of grain processed, or 15.5 pounds per hour, each. Therefore, these facilities are in compliance without controls.
- (u) The particulate (PM) emissions from the one (1) leg sprout truck loadout, identified as Leg Sprout Truck Loadout, associated with the one (1) truck shipping area, identified as EP-4, shall be limited to 69.9 pounds per hour when operating at a process weight rate of 1,080,000 pounds per hour (18,000 bushels). Emissions calculations based on AP-42 indicate that uncontrolled emissions from the one (1) leg sprout truck loadout will be 0.086 pounds of particulate per ton of grain processed, or 46.4 pounds per hour. Therefore, this facility is in compliance without controls.

326 IAC 6-4 (Fugitive Dust Emission Limitations)

This rule requires that the source not generate fugitive dust to the extent that some portion of the material escapes and is visible beyond the boundary or property line of the source.

Compliance Requirements

Compliance monitoring is required for the three (3) receiving pits, identified as Dump #1, Dump #2 and Dump #3, and the one (1) receiving pit, identified as Receiving Pit #2, associated with the one (1) truck receiving operation, identified as EP-1, in order to ensure that the baffles are operating properly at all times. The baffles must operate properly to in order for the three (3) receiving pits, identified as Dump #1, Dump #2 and Dump #3, and the one (1) receiving pit, identified as Receiving Pit #2, associated with the one (1) truck receiving operation, identified as EP-1 to comply with 326 IAC 6-3-2. The following compliance monitoring conditions are applicable:

To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. 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.

Testing

Compliance testing is not required because no emission unit with a control device has a potential to emit greater than 40 percent of the total source PTE. Potential emissions were calculated based on the U.S. EPA's Calculating Potential to Emit and Other Guidance for Grain Handling Facilities, November 14, 1995.

Conclusion

The construction and operation of this country grain elevator shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 147-20450-00055.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for New Construction and a Minor Source Operating Permit

Source Name: ADM/Growmark
Source Location: 609 N. State Road 66, Rockport, IN 47635
County: Spencer
Operation Permit No.: MSOP 147-20450-00055
SIC Code: 5173
Permit Reviewer: Craig J. Friederich

On May 26, 2005 the Office of Air Quality (OAQ) had a notice published in The Journal Democrat, Rockport, Indiana, stating that ADM/Growmark had applied for an operating permit to construct and operate a country grain elevator with baffles for particulate control. The notice also stated that OAQ proposed to issue a permit for this installation 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 clarification to the language in the Enforcement Issue Section of the Technical Support Document. The language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

Enforcement Issue

- (a) IDEM is aware that the grain elevator is not in compliance with the following emission limitation:
- 326 IAC 2-11 (Permit By Rule)
- Pursuant to 326 IAC 2-11 (Permit By Rule), the total annual grain throughput at the grain elevator shall be limited to less than 8,000,000 bushels
- (b) IDEM is reviewing this matter and ~~has taken~~ **will take** appropriate action.

On June 3, 2005, Amy L. Clyde, Environmental Manager of ADM Grain Division, submitted comments on the proposed construction operating permit. The summary of the comments and corresponding responses are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

ADM reviewed the emissions calculation table in Appendix A of the technical Support Document (TSD) and identified an error in the PM and PM₁₀ totals in the "Emissions After Control" Column. All of the rows do not appear to have been included in the calculation of each of these totals, although the individual rows contain correct data. Please re-calculate the totals in this column to represent the correct numbers and update the corresponding sections of the permit documents to reflect these corrections.

Response 1:

The spreadsheet has been updated and attached as revised Appendix A. The source status table in the Technical Support Document (TSD) has been revised as follows. No changes were required in the permit as a result of this comment.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on the U.S. EPA's Calculating Potential to Emit and Other Guidance for Grain Handling Facilities, November 14, 1995):

Pollutant	Emissions (tons/yr)
PM	87.5 98.0
PM ₁₀	20.6 23.5
SO ₂	--
VOC	--
CO	--
NO _x	--
Single HAP	--
Combination HAPs	--

Comment 2:

In addition, ADM noted in Appendix A under "Methodology", that this section incorrectly states the throughput is limited to 8,000,000 bushels. Please correct this section to reflect that the calculations in this permit are based off of 20,000,000 bushels of grain per year. The reference to "Emission factors from AP-42 (may 1998) Table 9.9.1-1, Particulate Emission Factors for Grain Elevators" is inaccurate. The emission factors for this permit were based off of the updated AP-42 (March 2003) Table 9.9.1-1, Particulate Emission Factors for Grain Elevators. In turn, the reference stating, "No emission factors are available for barge loading: Railcar loading was conservatively used as a substitute factor" is incorrect and should be deleted. The updated AP-42 included emission factors for barge loading and these factors were correctly used in the emission calculations table.

Response 2:

The spreadsheet has been updated and attached as revised Appendix A. No changes were required in the permit as a result of this comment.

**Appendix A: Emission Calculations
Grain Loading Operations**

* Revised Page 1 of 3 of App A

Company Name: ADM/Growmark
Address City IN Zip: 609 N. State road 66, Rockport, IN 47635
MSOP: 147-20450
Plt ID: 147-00055
Reviewer: Craig J. Friederich
Date: December 6, 2004

Process	Grain Throughput (tons/yr)	Pollutant	Emission Factor (lb/ton)	Potential Emissions (ton/yr)	Control Efficiency (%)	Emissions After Control (ton/yr)	Worst Case Controlled Emission (lb/hr)
Straight Truck Receiving	360,000	PM	0.18	32.4	60.00%	13.0	43.2
	360,000	PM-10	0.059	10.6	60.00%	4.2	14.2
Hopper Truck Receiving	240,000	PM	0.035	4.20	60.00%	1.7	8.40
	240,000	PM-10	0.0078	0.936	60.00%	0.37	1.87
Internal Handling	600,000	PM	0.061	18.3	99.00%	0.2	0.4
	600,000	PM-10	0.0340	10.2	99.00%	0.10	0.20
Storage Bin Vents	600,000	PM	0.025	7.50	0.00%	7.5	15.0
	600,000	PM-10	0.0063	1.89	0.00%	1.89	3.78
Barge Shipping	600,000	PM	0.016	4.80	90.00%	0.5	1.0
	600,000	PM-10	0.0040	1.20	90.00%	0.12	0.24
Truck Shipping	600,000	PM	0.086	25.80	90.00%	2.6	5.2
	600,000	PM-10	0.0290	8.70	90.00%	0.87	1.74
PM Total				93.0		25.38	
PM-10 Total				33.5		7.60	

METHODOLOGY

Potential to emit is based on a throughput of 20,000,000 bushels of grain per year.

Emission factors from AP-42 (March 2003) Table 9.9.1-1, Particulate Emission Factors for Grain Elevators

Throughput (tons/yr) was based on the worst-case density: wheat = 60 lbs/bushel.

Potential Emissions (tons/yr) = throughput (tons/yr) * EF (lbs/ton) / 2000 (lbs/ton)

60% control efficiency due to baffles in the truck unloading hopper.

Emissions after control (ton/yr) = Potential Emissions (ton/yr) * (1-Control Efficiency)

Worst Case Controlled Emission (lb/hr) = Maximum hourly throughput (20,000 bushels/hr) * Worst case density (wheat = 60 lb/bushel) / 2000 (lb/ton) * EF (lb/ton) * (1 - Control Efficiency)

**Appendix A: Emission Calculations
Vehicle Emissions**

Company Name: ADM/Growmark
Address City IN Zip: 609 N. State road 66, Rockport, IN 47635
MSOP: 147-20450
Plt ID: 147-00055
Reviewer: Craig J. Friederich
Date: December 6, 2004

Particle size (k)	Mean % silt content (s)	Constant for PM-10 (b)	Constant for PM-10 (c)	Tons ave vehicle weight (W)	Surface material moisture content (M)	MPH speed limit (S)	# of Days with at least 0.01" rainfall (p)
2.6	4.8	0.4	0.3	26	0.2	10	120
Straight Trucks	Lb PM/Mile	Lb PM10/Mile	Trips per hour	Miles per trip	Total miles per yr	PM Emissions	PM10 Emissions
	1.33	6.33	1.59	0.35	9749.88	30.85	6.46

Vehicle traffic on unpaved roads, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 13.2.2.2

$$E_f = k * [(s/12)^{0.8}] * [(W/3)^b] / [(M/0.2)^c] * [(365-p)/365] * (S/15)$$

**Appendix A: Emission Calculations
Vehicle Emissions**

Company Name: ADM/Growmark
Address City IN Zip: 609 N. State road 66, Rockport, IN 47635
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2.6	4.8	0.4	0.3	12	0.2	10	120
Straight Trucks	Lb PM/Mile	Lb PM10/Mile	Trips per hour	Miles per trip	Total miles per yr	PM Emissions	PM10 Emissions
	0.97	4.30	3.17	0.35	19438.44	41.79	9.46

Vehicle traffic on unpaved roads, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 13.2.2.2

$$E_f = k * [(s/12)^{0.8}] * [(W/3)^b] / [(M/0.2)^c] * [(365-p)/365] * (S/15)$$