



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: December 17, 2007
RE: ADM Grain Company / 163-20504-00042
FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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.dot12/03/07



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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
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**Minor Source Operating Permit
OFFICE OF AIR QUALITY
AND EVANSVILLE EPA**

**ADM Grain Company
2350 Broadway Avenue
Evansville, Indiana 47712**

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

This permit is issued 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M163-20504-00042	
Issued by: Original Signed By: Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 17, 2007 Expiration Date: December 17, 2012

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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) and Evansville EPA (EEPA). 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 country grain elevator operation.

Source Address:	2350 Broadway Avenue, Evansville, Indiana 47712
Mailing Address:	1001 North Brush College Road, Decatur, IL 62521
General Source Phone Number:	812-424-3581
SIC Code:	5153
County Location:	Vanderburgh
Source Location Status:	Non-attainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two (2) truck receiving facilities, identified as Pit # 1 and # 2, constructed in 1988 and 1949, respectively, each with a maximum throughput of 20,000 bushels of grain per hour, exhausting to baghouse # 2 for pollution control.
- (b) One (1) truck receiving facility, identified as Pit # 3, constructed in 1949, with a maximum throughput of 12,000 bushels of grain per hour, exhausting to baghouse # 2 for pollution control.
- (c) Two (2) truck loadout areas, identified as EP-03, constructed in 1949, with a maximum throughput of 10,000 bushels of grain per hour and exhausting to baghouse # 2 for pollution control.
- (d) One (1) rail loadout, identified as EP-05, constructed in 1990, with a maximum throughput of 22,000 bushels of grain per hour, exhausting to baghouse # 1 for pollution control.
- (e) One (1) barge loadout, identified as EP-04, constructed in 1979, with a maximum throughput of 36,000 bushels of grain per hour, exhausting to baghouse # 1 for pollution control.
- (f) One (1) natural gas column grain dryer, identified as EP-06, constructed in 1996, with a 31.6 mmBtu/hour burner, with a maximum throughput of 3,000 bushels of grain per hour.
- (g) One (1) grain cleaner, identified as EP-07, constructed in 1989, with a maximum throughput of 10,000 bushels of grain per hour.
- (h) Seven (7) bucket elevators associated with fully enclosed conveyor belts, known as

internal handling, identified as EP-08, constructed between 1949 to 2001, with a maximum throughput of 24,000 bushels of grain per hour, exhausting to baghouse # 1 and # 2 for pollution control.

- (i) Three (3) storage bins, identified as bins #2, #3, and #4, each with a maximum capacity of 15,018 bushels of grain.
- (j) Two (2) storage bins, identified as bins #5 and #10, each with a maximum capacity of 3,739 bushels of grain.
- (k) Four (4) storage bins, identified as bins #6, #7, #8, and #9, each with a maximum capacity of 4,541 bushels of grain.
- (l) Two (2) storage bins, identified as bins #11 and #12, each with a maximum capacity of 1,910 bushels of grain.
- (m) One (1) storage bin, identified as bin #13, with a maximum capacity of 2,750 bushels of grain.
- (n) Ten (10) storage bins, identified as bins #100, #101, #102, #103, #104, #300, #301, #302, #303, and #304, each with a maximum capacity of 16,634 bushels of grain.
- (o) Two (2) storage bins, identified as bins #200 and #205, each with a maximum capacity of 5,136 bushels of grain.
- (p) Four (4) storage bins, identified as bins #201, #202, #203, and #204, each with a maximum capacity of 13,085 bushels of grain.
- (q) One (1) storage bin, identified as bin #500, with a maximum capacity of 21,383 bushels of grain.
- (r) Two (2) storage bins, identified as bins #501 and #701, each with a maximum capacity of 21,675 bushels of grain.
- (s) Eight (8) storage bins, identified as bins # 502, #503, #504, #505, #702, #703, #704, and #705, each with a maximum capacity of 21,993 bushels of grain.
- (t) Three (3) storage bins, identified as bins #600, #601, and #602, each with a maximum capacity of 14,323 bushels of grain.
- (u) Two (2) storage bins, identified as bins #603 and #604, each with a maximum capacity of 14,492 bushels of grain.
- (v) One (1) storage bin, identified as bin #605, with a maximum capacity of 6,745 bushels of grain.
- (w) One (1) storage bin, identified as bin #700, with a maximum capacity of 21,940 bushels of grain.
- (x) Two (2) storage bins, identified as bins #801 and #802, each with a maximum capacity of 146,000 bushels of grain.
- (y) One (1) storage bin, identified as bin #1 that is used to weigh product only.
- (z) Haul roads, identified as EP-09. [326 IAC 6-4]

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M163-20504-00042, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ and EEPA, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and EEPA, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by EEPA.

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ and EEPA, within a reasonable time, any information that IDEM, OAQ and EEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and EEPA copies of records required to be kept by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

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

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual 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) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, Indiana 47713

- (c) 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 and EEPA on or before the date it is due.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ and EEPA upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and EEPA. IDEM, OAQ and EEPA may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) 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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M163-20504-00042 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and EEPA and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, Indiana 47713

- (b) A timely renewal application is one that is:

- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
- (2) 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 and EEPA on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ and EEPA takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and EEPA any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, Indiana 47713

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

B.15 Source Modification Requirement

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

B.16 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][IC 13-17-3-2][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, and EEPA 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 the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, Indiana 47713

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees EEPA by the date specified on the invoice.
- (b) The Permittee may call 812-435-6145 to determine the appropriate permit fee and due date.

B.19 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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

C.1 Permit Revocation [326 IAC 2-1.1-9]

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on December 09, 2004. The plan is included as Attachment A.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice 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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, Indiana 47713

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 2-1.1-1(1).

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

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, Indiana 47713

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ and EEPA of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and EEPA not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and EEPA 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.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 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.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.14 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;

- (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

C.16 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) and EEPA 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 and EEPA, 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.17 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 or EEPA makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or EEPA within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Community Center
100 E. Walnut St., Suite 100
Evansville, Indiana 47713

- (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 and EEPA on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.
- (e) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and EEPA. The general public may request this information from the IDEM, OAQ and EEPA under 326 IAC 17.1.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

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

- (a) Two (2) truck receiving facilities, identified as Pit # 1 and # 2, constructed in 1988 and 1949, respectively, each with a maximum throughput of 20,000 bushels of grain per hour, exhausting to baghouse # 2 for pollution control.
- (b) One (1) truck receiving facility, identified as Pit # 3, constructed in 1949, with a maximum throughput of 12,000 bushels of grain per hour, exhausting to baghouse # 2 for pollution control.
- (c) Two (2) truck loadout areas, identified as EP-03, constructed in 1949, with a maximum throughput of 12,000 bushels of grain per hour and exhausting to baghouse # 2 for pollution control.
- (d) One (1) rail loadout, identified as EP-05, constructed in 1990, with a maximum throughput of 22,000 bushels of grain per hour, exhausting to baghouse # 1 for pollution control.
- (e) One (1) barge loadout, identified as EP-04, constructed in 1979, with a maximum throughput of 36,000 bushels of grain per hour, exhausting to baghouse # 1 for pollution control.
- (f) One (1) natural gas column grain dryer, identified as EP-06, constructed in 1996, with a 31.6 mmBtu/hour burner and a maximum throughput of 3,000 bushels of grain per hour.
- (g) One (1) grain cleaner, identified as EP-07, constructed in 1989, with a maximum throughput of 10,000 bushels of grain per hour.
- (h) Seven (7) bucket elevators associated with fully enclosed conveyor belts, known as internal handling, identified as EP-08, constructed between 1949 to 2001, with a maximum throughput of 24,000 bushels of grain per hour, exhausting to baghouse # 1 and # 2 for pollution control.
- (i) Three (3) storage bins, identified as bins #2, # 3, and #4, each with a maximum capacity of 15,018 bushels of grain.
- (j) Two (2) storage bins, identified as bins # 5 and #10, each with a maximum capacity of 3,739 bushels of grain.
- (k) Four (4) storage bins, identified as bins #6, #7, #8, and #9, each with a maximum capacity of 4,541 bushels of grain.
- (l) Two (2) storage bins, identified as bins #11 and #12, each with a maximum capacity of 1,910 bushels of grain.
- (m) One (1) storage bin, identified as bin #13, with a maximum capacity of 2,750 bushels of grain.

- (n) Ten (10) storage bins, identified as bins #100, #101, #102, #103, #104, #300, #301, #302, #303, and #304, each with a maximum capacity of 16,634 bushels of grain.
- (o) Two (2) storage bins, identified as bins #200 and #205, each with a maximum capacity of 5,136 bushels of grain.
- (p) Four (4) storage bins, identified as bins #201, #202, #203, and #204, each with a maximum capacity of 13,085 bushels of grain.
- (q) One (1) storage bin, identified as bin #500, with a maximum capacity of 21,383 bushels of grain.
- (r) Two (2) storage bins, identified as bins #501 and #701, each with a maximum capacity of 21,675 bushels of grain.
- (s) Eight (8) storage bins, identified as bins #502, #503, #504, #505, #702, #703, #704, and #705, each with a maximum capacity of 21,993 bushels of grain.
- (t) Three (3) storage bins, identified as bins #600, #601, and #602, each with a maximum capacity of 14,323 bushels of grain.
- (u) Two (2) storage bins, identified as bins #603 and #604, each with a maximum capacity of 14,492 bushels of grain.
- (v) One (1) storage bin, identified as bin #605, with a maximum capacity of 6,745 bushels of grain.
- (w) One (1) storage bin, identified as bin #700, with a maximum capacity of 21,940 bushels of grain.
- (x) Two (2) storage bins, identified as bins #801 and #802, each with a maximum capacity of 146,000 bushels of grain.
- (y) One (1) storage bin, identified as bin #1 that is used to weigh product only.
- (z) Haul roads, identified as EP-09. [326 IAC 6-4]

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Vanderburgh County Particulate Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the facilities shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

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 this facility and their control devices.

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

D.1.3 Visible Emissions Notations

- (a) Visible emission notations of baghouses # 1 and # 2 stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during the part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

D.1.4 Parametric Monitoring

The Permittee shall record the pressure drop across baghouses # 1 and # 2 used in conjunction with the truck receiving facilities, rail loadout, truck loadout, barge loadout, grain cleaner, and internal handling operations, at least once per day when the grain handling processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

The instrument used for determining pressure shall comply with Section C.12 – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.5 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an excursion or exceedance and the Permittee satisfies the excursion or exceedance provisions of this permit (Section C – Response to Excursions or Exceedances). Within eight (8) business hours of the determination of failure, response steps according to the Response to Excursions or Exceedances condition shall be initiated.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as a malfunction and the Permittee satisfies the requirements of Section C – Malfunctions Report).

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain a daily record of visible emission notations of both baghouse stack exhausts. The Permittee shall include in each daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain a daily record of pressure drop reading across each baghouse. The Permittee shall include in each daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) 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**

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: ADM Grain Company
Source Address: 2350 Broadway Avenue, Evansville, IN 47712
Mailing Address: 1001 North Brush College Road, Decatur, IL 62521
MSOP No.: M163-20504-00042

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER – (317) 233-6865**

**CITY OF EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY
FAX NUMBER - (812) 435-6155**

**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: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:
CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY
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 Grain Company
Address:	2350 Broadway Avenue
City:	Evansville, IN 47712
Phone #:	(812) 424-3581
MSOP #:	M163-20504-00042

I hereby certify that ADM Grain Company is

- still in operation.
- no longer in operation.

I hereby certify that ADM Grain Company is

- in compliance with the requirements of MSOP 163-20504-00042.
- not in compliance with the requirements of MSOP 163-20504-00042.

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:

Mail to: Permit Administration & Development Section
Office Of Air Quality
MC 61-53 IGCM 1003
100 North Senate Avenue
Indianapolis, Indiana 46204

Attachment A Fugitive Dust Plan



**ADM Grain Company
2350 Broadway
Evansville, IN 47712**

Procedure for Dust Control on Unpaved Driveway

Purpose: Control fugitive emissions from the unpaved roadways

Water, Asphalt Emulsion or an equivalent material will be used to control dust from unpaved driveways. This will be done on as needed basis to control nuisance dust.

If Asphalt Emulsion or an equivalent material is applied the following must happen:

1. Gravel driveway must be graded and worked to bring loose gravel to the top
2. Soapstock or equivalent material will then be applied to the driveway
3. Temperature must be above 70 degrees F to allow the material to be absorbed into the drive
4. Traffic must be restricted from the driveway for 3 days to allow the material to set-up
5. The driveway must be dry when applying the soapstock.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	ADM Grain Company
Source Location:	2350 Broadway Avenue, Evansville, Indiana 47712
County:	Vanderburgh
SIC Code:	5153
MSOP Permit No.:	M163-20504-00042
Permit Reviewer:	Anne-Marie C. Hart/Edward Judson

On November 7, 2007, the Office of Air Quality (OAQ) sent a Public Notice to the Evansville Courier stating that ADM Grain Company had applied for a Minor Source Operating Permit to operate a country grain elevator. The notice also stated that OAQ proposed to issue a Minor Source Operating Permit for this operation and provided information on how the public could review the proposed Minor Source Operating 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 Minor Source Operating Permit should be issued as proposed.

On November 15, 2007, on behalf of the City of Evansville Environmental Protection Agency (EEPA), Dona J. Bergman submitted comments on the proposed Minor Source Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

B.18 (a) Annual Fee Payment: The contract between IDEM and EEPA allows EEPA to collect annual fees from MSOP sources in our jurisdiction. Please change this Condition to read:

- (a) The Permittee shall pay annual fees to EEPA by the date specified on the invoice.
- (b) The Permittee may call 812-435-6145 to determine appropriate fee and due date.

Response 1:

The following changes have been made to Condition B.18, pages 10 and 11 of the permit:

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

-
- (a) The Permittee shall pay annual fees to ~~IDEM, OAQ and EEPA~~ **within thirty (30) calendar days of receipt of a billing by the date specified on the invoice.**
 - (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),~~ **812-435-6145** to determine the appropriate permit fee **and due date.**

Comment 2:

C.6 Fugitive Particulate Matter: A plan to control fugitive particulate matter is referenced as "Attachment A", but no Attachment A could be located within the draft permit and there is no reference to an "Attachment A" in the Table of Contents.

Response 2:

A copy of the Fugitive Dust Plan has been included at the end of the permit. The following has been added to the Table of Contents of the permit, page 3:

Attachment A: Fugitive Dust Plan 27

Comment 3:

C.9 (b): Please include the EEPA in this subcondition.

Response 3:

The following has been added to Condition C.9 (b) on page 14 of the permit:

- (b) The Permittee shall notify IDEM, OAQ **and EEPA** of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Comment 4:

C.15 (a): Please include the EEPA in this subcondition.

Response 4:

The following has been added to C.15 (a) on page 16 of the permit:

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, **and EEPA** within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

Comment 5:

C.15 (c): Please include the EEPA in this subcondition

Response 5:

The following has been added to C.15 (c) on page 16 of the permit:

- (c) IDEM, OAQ **and EEPA** reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Comment 6:

C.16 (a): Please include the EEPA in this subcondition.

Response 6:

The following has been added to C.16 (a) on page 17 of the permit:

- (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) **and EEPA** or appointed representative upon request.

Comment 7:

C. 16 (b): Please include the EEPA in this subcondition.

Response 7:

The following has been added to C.16 (b) on page 17 of the permit:

- (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 **and EEPA**, 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.

Comment 8:

D.1.6 (a) Record Keeping Requirements: It is unclear how the requirements to maintain monthly grain throughput records demonstrates compliance with Condition 1.1's emission limit of 0.03 grains per dry standard cubic foot.

Response 8:

326 IAC 6.5-1-2(d)(1) states:

For grain elevators that began construction or modification before January 13, 1977, any grain storage elevator located at any grain processing source that has a permanent grain storage capacity of thirty-five thousand two hundred (35,200) cubic meters (one million (1,000,000) U.S. bushels) or more, and any grain terminal elevator that has a permanent grain storage capacity of eighty-eight thousand one hundred (88,100) cubic meters (two million five hundred thousand (2,500,000) U.S. bushels) or more shall be limited to particulate matter emissions of no greater than seven-hundredths (0.07) g/dscm (three-hundredths (0.03) grain per dscf).

Applicability of 326 IAC 6.5-1-2(d)(1) is dependent on the capacity, not throughput at the facility.

Condition 1.6 (a) has been removed and the following changes made to page 22 of the permit.

D.1.6 Record Keeping Requirements

- ~~(a)~~ To document compliance with Condition D.1.1, the Permittee shall maintain monthly records of the grain throughput for the entire source.
- ~~(b)~~(a) To document compliance with Condition D.1.3, the Permittee shall maintain a daily record of visible emission notations of both baghouse stack exhausts. The Permittee shall include in each daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- ~~(c)~~(b) To document compliance with Condition D.1.4, the Permittee shall maintain a daily record of pressure drop reading across each baghouse. The Permittee shall include in each daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- ~~(d)~~(c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements of this permit.

Comment 9:

Malfunction Report Form: Please add EEPA's contact information to the header of this form.

Response 9:

The following has been added to the Malfunction Report Form, page 24 of the permit:

**CITY OF EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY
FAX NUMBER - (812) 435-6155**

Upon further review, the IDEM, OAQ has made the following changes with new language in **bold** and deleted language in ~~strike through~~:

Change 1:

Operation Permit No.: M163-20504-00042	
Issued by: Nisha Sizemore, Chief Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

**Indiana Department of Environmental Management
Office of Air Quality
Evansville Environmental Protection Agency**

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

Source Background and Description

Source Name:	ADM Grain Company
Source Location:	2350 Broadway Avenue, Evansville
County:	Vanderburgh
SIC Code:	5153
MSOP Permit No.:	M163-20504-00042
Permit Reviewer:	Anne-Marie C. Hart/Edward Judson

IDEM's Office of Air Quality (OAQ) has reviewed an application from ADM Grain Company relating to the operation of a country grain elevator.

History

On December 13, 2004, ADM Grain Company submitted applications to the OAQ requesting a Minor Source Operating Permit (MSOP). Prior to this application for an MSOP, ADM Grain Company operated under Municipal Certificate of Operation #1241, issued by the Evansville Environmental Protection Agency on September 18, 1973 and Municipal Certificate of Operation #0711 issued on March 18, 2004. However, ADM Grain Company is subject to 326 IAC 2 and requires a State Level Permit and therefore no longer meets the requirements under MCE 3.30.221 for Municipal Level Permits.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) truck receiving facilities, identified as Pit # 1 and # 2, constructed in 1988 and 1949, respectively, each with a maximum throughput of 20,000 bushels of grain per hour, exhausting to baghouse # 2 for pollution control.
- (b) One (1) truck receiving facility, identified as Pit # 3, constructed in 1949, with a maximum throughput of 12,000 bushels of grain per hour, exhausting to baghouse # 2 for pollution control.
- (c) Two (2) truck loadout areas, identified as EP-03, constructed in 1949, with a maximum throughput of 12,000 bushels of grain per hour and exhausting to baghouse # 2 for pollution control.
- (d) One (1) rail loadout, identified as EP-05, constructed in 1990, with a maximum throughput of 22,000 bushels of grain per hour, exhausting to baghouse # 1 for pollution control.
- (e) One (1) barge loadout, identified as EP-04, constructed in 1979, with a maximum throughput of 36,000 bushels of grain per hour, exhausting to baghouse # 1 for pollution control.

- (f) One (1) natural gas column grain dryer, identified as EP-06, constructed in 1996, with a 31.6 mmBtu/hour burner and a maximum throughput of 3,000 bushels of grain per hour.
- (g) One (1) grain cleaner, identified as EP-07, constructed in 1989, with a maximum throughput of 10,000 bushels of grain per hour.
- (h) Seven (7) bucket elevators associated with fully enclosed conveyor belts, known as internal handling, identified as EP-08, constructed between 1949 to 2001, with a maximum throughput of 24,000 bushels of grain per hour, exhausting to baghouse # 1 and # 2 for pollution control.
- (i) Three (3) storage bins, identified as bins #2, # 3, and #4, each with a maximum capacity of 15,018 bushels of grain.
- (j) Two (2) storage bins, identified as bins # 5 and #10, each with a maximum capacity of 3,739 bushels of grain.
- (k) Four (4) storage bins, identified as bins #6, #7, #8, and #9, each with a maximum capacity of 4,541 bushels of grain.
- (l) Two (2) storage bins, identified as bins #11 and #12, each with a maximum capacity of 1,910 bushels of grain.
- (m) One (1) storage bin, identified as bin #13, with a maximum capacity of 2,750 bushels of grain.
- (n) Ten (10) storage bins, identified as bins #100, #101, #102, #103, #104, #300, #301, #302, #303, and #304, each with a maximum capacity of 16,634 bushels of grain.
- (o) Two (2) storage bins, identified as bins #200 and #205, each with a maximum capacity of 5,136 bushels of grain.
- (p) Four (4) storage bins, identified as bins #201, #202, #203, and #204, each with a maximum capacity of 13,085 bushels of grain.
- (q) One (1) storage bin, identified as bin #500, with a maximum capacity of 21,383 bushels of grain.
- (r) Two (2) storage bins, identified as bins #501 and #701, each with a maximum capacity of 21,675 bushels of grain.
- (s) Eight (8) storage bins, identified as bins #502, #503, #504, #505, #702, #703, #704, and #705, each with a maximum capacity of 21,993 bushels of grain.
- (t) Three (3) storage bins, identified as bins #600, #601, and #602, each with a maximum capacity of 14,323 bushels of grain.
- (u) Two (2) storage bins, identified as bins #603 and #604, each with a maximum capacity of 14,492 bushels of grain.
- (v) One (1) storage bin, identified as bin #605, with a maximum capacity of 6,745 bushels of grain.
- (w) One (1) storage bin, identified as bin #700, with a maximum capacity of 21,940 bushels of grain.

- (x) Two (2) storage bins, identified as bins #801 and #802, each with a maximum capacity of 146,000 bushels of grain.
- (y) One (1) storage bin, identified as bin #1 that is used to weigh product only.
- (z) Haul roads, identified as EP-09. [326 IAC 6-4]

Existing Approvals

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

- (a) Municipal Certificate of Operation # 1241 issued by the Evansville Environmental Protection Agency on September 18, 1973; and
- (b) Municipal Certificate of Operation # 0711 issued on March 18, 2004.

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

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (in)	Flow Rate (acfm)	Temperature (°F)
Baghouse 1	Pits 1 & 2	5	45	20,860	Ambient
Baghouse 2	Pit 3	5	45	34,000	Ambient

Recommendation

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

An application for the purposes of this review was received on December 13, 2004.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document, pages 1 through 9.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM2.5	non-attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
8 hr. ozone	attainment
CO	attainment
Lead	attainment

- (a) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Vanderburgh County to attainment for the eight-hour ozone standard and revoking the one-hour ozone standard in Indiana.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment for the 8-hour ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Vanderburgh County as nonattainment for PM2.5. 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 non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Emission Offset requirements. See the State Rule Applicability – Entire Source section.
- (d) Vanderburgh County has been classified as attainment for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (e) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

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	216.6
PM-10	71.2
SO ₂	≤ 0.1
VOC	0.4
CO	4.9
NOx	14.0

HAPs	Potential to Emit (tons/yr)
Benzene	≤ 0.1
Dichlorobenzene	≤ 0.1
Formaldehyde	≤ 0.1
Hexane	0.25
Toluene	≤ 0.1
Lead	≤ 0.1
Cadmium	≤ 0.1
Chromium	≤ 0.1
Manganese	≤ 0.1
Nickel	≤ 0.1
Total	1.15

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Potential to Emit (tons/yr)						
	PM	PM10	SO2	VOC	CO	NOx	HAPs
Receiving (Straight Truck)	59.2	19.4					
Internal Handling	20.0	11.2					
Cleaning	24.7	6.2					
Drying	72.4	18.1	≤ 0.1	0.4	4.9	14.0	1.25
Storage Bin Vents	8.2	2.1					
Shipping (Truck)	28.3	9.5					
Haul Roads	3.8	0.7					
Total Emissions	216.6	71.2	≤ 0.1	0.4	4.9	14.0	1.25

All values in the table represent the limited potential emissions. The particulate from the straight truck receiving is limited by 326 AC 6-3-2.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

- (b) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (1) 40 CFR Part 60, Subpart DD, Standards of Performance for Grain Elevators applies to a Grain Terminal Elevator with a permanent storage capacity less than 2.5 million U.S. bushels. This source is not subject to these requirements because it has a permanent storage capacity of 939,533 U.S. bushels. Therefore, 40 CFR Part 60, Subpart DD, Standards of Performance for Grain Elevators does not apply to this source.

- (2) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 326 IAC 20 and 40 CFR Part 61 and 63) applicable to this source or included in this permit.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not one of the twenty-eight (28) listed source categories, and the potential to emit (PTE) of all criteria pollutants is less than two hundred fifty (250) tons per year. Therefore, this source is a minor source under 326 IAC 2-2 (PSD).

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

The operation of this source will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead in the ambient air at levels equal to or greater than five (5) tons per year.

326 IAC 5-1 (Visible Emissions 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-2.

- (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 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.

326 IAC 6-5 (Fugitive Particulate Matter Emissions)

Fugitive particulate matter (PM) emissions are greater than 25 tons per year and the source is located in the city of Evansville. Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate emissions from the unpaved road are controlled by spraying with water, asphalt emulsion or an equivalent material on an as needed basis. In 2006, this facility paved all but a small portion of its access road(s). A fugitive particulate matter emissions control plan has been submitted (see Attachment A to the permit).

326 IAC 6.5-1-2 (Vanderburgh County Particulate Limitations)

All facilities at this source are subject to this rule because this source is located in Vanderburgh County which is one of the specifically listed counties under 326 IAC 6.5-1-7 and has potential particulate matter emissions greater than 100 tons per year. Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the facilities shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

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

This source is located in Vanderburgh County and subject to the provisions of 326 IAC 6.5-1-2 (Vanderburgh County Particulate Limitations). Therefore, the provisions of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) are not applicable to this source.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

- (a) The grain receiving operation has applicable compliance monitoring conditions as specified below:

-
- (1) Visible emission notations of baghouses # 1 and # 2 stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or

shut down time. In the case of batch or discontinuous operations, readings shall be taken during the part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (2) The Permittee shall record the pressure drop across baghouses # 1 and # 2 used in conjunction with the truck receiving facilities, rail loadout, truck loadout, barge loadout, grain cleaner, and internal handling operations, at least once per day when the processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

- (3) In the event that bag failure has been observed:
 - (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

 - (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring operations are necessary because the baghouse for the grain receiving Operation must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Process), 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (Prevention of Significant Deterioration).

Conclusion

The operation of this country grain elevator shall be subject to the conditions of the Minor Source Operating Permit M163-20504-00042.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: ADM/Growmark

Address City IN Zip: 2350 Broadway Avenue, Evansville, Indiana 47712

Permit Number: M163-20504-00042

Pit ID: 163-00042

Reviewer: Anne-Marie C. Hart

Date: June 21, 2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

31.6

276.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.3	1.1	0.1	13.8	0.8	11.6

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

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

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: ADM/Growmark

Address City IN Zip: 2350 Broadway Avenue, Evansville, Indiana 47712

Permit Number: M163-20504-00042

Plt ID: 163-00042

Reviewer: Anne-Marie C. Hart

Date: June 21, 2007

HAPs - Organics					
Emission Factor in lb/M	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in to	2.907E-04	1.661E-04	1.038E-02	2.491E-01	4.706E-04

HAPs - Metals					
Emission Factor in lb/M	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in to	6.920E-05	1.522E-04	1.938E-04	5.260E-05	2.907E-04

Methodology is the same as page

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

ADM/Growmark
 Evansville, IN
 163-00042

PTE - WITHOUT CONTROLS

Maximum received		
Bushels/year ¹	Bushels/year ²	Tons per year ³
19,584,071	23,500,885	705,026

	Tons of grain	AP-42 Factor PM *	AP-42 Factor PM10 *	PM Emissions	PM10 Emissions
Receiving					
Straight Truck	705,026	0.180	0.059	63.45	20.80
Internal Handling	705,026	0.061	0.034	21.50	11.99
Cleaning	705,026	0.075	0.019	26.44	6.61
Drying	705,026	0.220	0.055	77.55	19.39
Shipping					
Truck	705,026	0.086	0.029	30.32	10.22
Storage Bin Vents	705,026	0.025	0.006	8.81	2.22
Haul Roads	658,025	See Vehicle Emissions Spreadsheet		3.82	0.77
Totals				231.900	71.220

¹ To calculate maximum received bushels/year, calculate the amount of grain received by the facility each of the last five years and use the largest of these numbers.

² To calculate bushels/year, multiply maximum received bushels/year by 1.2 per EPA guidelines.

³ Tons per year = bushels per year x 60lbs/bushel of grain

* AP-42 Factors are from Table 9.9.1-1. Particulate Emission Factors for Grain Elevators

Assumptions made when calculating PTE:

- All grain is received by straight truck.
- All grain received was cleaned.
- All grain received was dried.
- All grain received was shipped out by truck.
- There is no control equipment on any of these processes.

Vehicle Emissions

PTE

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	40	0.2	15	125
Straight Trucks	Lb PM/Mile	Lb PM10/Mile	Trips per hour	Miles per trip	Total miles per yr	PM Emissions	PM10 Emissions
	2.31	11.54	4	0.00945	662.256	3.82	0.77

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

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

Actuals 2005							
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	40	0.2	15	125
Straight Trucks	Lb PM/Mile	Lb PM10/Mile	Trips per hour	Miles per trip	Total miles per yr	PM Emissions	PM10 Emissions
	2.31	11.54	3	0.123	6464.88	37.29	7.48

* additional paving was completed at facility in 2006 that reflects reduced PM PTE emissions from 2005 Actuals. Once paving was accomplished, only straight trucks are included in the Emission calculations.

PTE - WITH CONTROLS

Maximum received			Cubic Feet	
Bushels/year ¹	Bushels/year ²	Tons per year ³	per hour	mmcf
19,584,071	23,500,885	658,025	32011	280.416

	Tons of grain	AP-42 Factor PM *	AP-42 Factor PM10 *	Controls	Control Efficiencies	Emissions					
						PM	PM10	NOx	SO2	CO	VOC
Receiving											
Straight Truck	658,025	0.180	0.059	Baghouse	99%	0.592	0.194				
Internal Handling	1,316,050	0.061	0.034	Baghouse / Enclosures	99%	0.401	0.224				
Cleaning	658,025	0.075	0.019	Enclosure	99%	0.247	0.062				
Drying	658,025	0.220	0.055			72.383	18.096				
Combustion		See Below				1.921	1.921	14.021	0.084	4.907	0.393
Shipping											
Straight Truck	658,025	0.086	0.029	Socks / Sleeves	90%	2.830	0.954				
Storage Bin Vents	658,025	0.025	0.006			8.225	2.073				
Haul Roads	658,025	See Vehicle Emissions Spreadsheet				3.820	0.766				
					Totals	90.418	24.289	14.021	0.084	4.907	0.393

AP-42 Factors	PM	PM10	CO	NOx	SO2	VOC
Grain Drying						
Combustion	13.7	13.7	35	100	0.6	2.8

1 To calculate maximum received bushels/year, calculate the amount of grain received by the facility each of the last five years and use the largest of these numbers.

2 To calculate bushels/year, multiply maximum received bushels/year by 1.2.

3 To calculate Tons per year, multiply bushels/year by 60 (pounds per ton of corn) and divide by 2000 (pounds per ton).

* AP-42 Factors are from Table 9.9.1-1. Particulate Emission Factors for Grain Elevators

Assumptions made when calculating PTE:

All grain is received by straight truck.

All grain received was cleaned.

All grain received was dried.

All grain received was shipped out by straight truck.

Actual Emissions

Maximum received		
Bushels/year ¹	Tons per year ^{2,3}	mmcf ³
18,258,536	547,756	6.382

Emissions

	Maximum Grain Throughput (tons/yr)	AP-42 Factor PM *(lbs/ton)	AP-42 Factor PM10 *(lbs/ton)	Controls	Control Efficiencies	PM	PM10	NOx	SO2	CO	VOC	HAPs
Receiving												
Straight Truck	547,756	0.180	0.059	Baghouse	99%	0.493	0.162					
Internal Handling	1,095,512	0.061	0.034	Baghouse / Enclosures	99%	0.334	0.186					
Cleaning	25,500	0.075	0.019	Enclosure	99%	0.010	0.002					
Drying	34,488	0.220	0.055		0%	3.794	0.948					
Combustion						0.044	0.044	0.319	0.002	0.112	0.009	0.31
Shipping												
Truck	547,756	0.086	0.029	Socks / Sleeves	90%	2.355	0.794					
Storage Bin Vents	547,756	0.025	0.006		0%	6.847	1.725					
Haul Roads	584,457	See Vehicle Emissions Spreadsheet			0%	37.288	7.482					
					Totals	51.164	11.345	0.319	0.002	0.112	0.009	

AP-42 Factors	PM	PM10	CO	NOx	SO2	VOC
Grain Drying						
Combustion	13.7	13.7	35	100	0.6	2.8

1 Maximum Processing Rate (tons/yr) = Maximum Processing Rate (bushels/hr) x 60 (lbs/bushel) x 1 ton/2000lbs

2 PTE of PM/PM10 Before Control (tons/yr) = Maximum Throughput (tons/yr) x Emission Factor (lbs/ton) x 1 ton/2,000 lbs.

3 PTE of PM/PM10 After Control (tons/yr) = Maximum Throughput (tons/yr) x Emission Factor (lbs/ton) x 1 ton/2,000 lbs x (1-Control Efficiency (%))

* AP-42 Factors are from Table 9.9.1-1. Particulate Emission Factors for Grain Elevators

Assumptions made when calculating PTE:

All grain is received by straight truck.

All grain received was shipped out by truck.