



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: August 3, 2005
RE: Monsanto Company / 073-20867-00035
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 1/10/05



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MINOR SOURCE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Monsanto Company
15849 South U.S. Highway 231
Remington, Indiana 47977**

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

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

Operation Permit No.: MSOP 073-20867-00035	
Issued by: Original Signed By: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 3, 2005 Expiration Date: August 3, 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 hybrid corn seed processing plant.

Authorized Individual: Paul Sellmyer, Site Manager
Source Address: 15849 South U.S. Highway 231, Remington, Indiana 47977
Mailing Address: 15849 South U.S. Highway 231, Remington, Indiana 47977
General Source Phone: (219) 261-2122
SIC Code: 0723
County Location: Jasper
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) Two (2) natural gas-fired grain dryers, identified as Dry 2A and Dry 2B, installed in 1976. Each dryer has four (4) burners and a heat input rate of 60 MMBtu/hr and drying rate of 20,238 bushels per batch (Bu/batch);
- (b) Two (2) shellers, identified as #3 and #4, installed in 1991, each with a capacity of 100,800 lb/hr, and equipped with four (4) cyclones, identified as #3A, #3B, #4A, and #4B, for control;
- (c) One (1) ear corn aspirator, identified as #5, installed in 1985, with a capacity of 201,600 pounds per hour (lb/hr), and equipped with one (1) cyclone, identified as #5A, for control;
- (d) One (1) Cimbria Delta 117 corn grain cleaner, identified as #14, installed in 2003, with a capacity of 33,600 lb/hr, and equipped with one (1) cyclone, identified as #14A, and one (1) bagfilter, identified as #14B, for control. Air from the control units is exhausted inside the building;
- (e) One (1) sizing machinery, identified as #7, installed in 1976, with a capacity of 33,600 lb/hr, and equipped with one (1) cyclone, identified as #7A, for control. The air from the control unit is exhausted inside the building;
- (f) Two (2) corn grain Duo-aspirators, identified as #8 and #9, installed in 1976, each with a capacity of 17,000 lb/hr. Duo-aspirator #8 is equipped with one (1) cyclone, identified as #8A, and Duo-aspirator #9 is equipped with one (1) cyclone, identified as #10A, for control;
- (g) Two (2) gravity tables, identified as #10 and #11, installed in 1976, each with a capacity of 14,000 lb/hr, and equipped with two (2) cyclones, identified as #9A and #11A;

- (h) One (1) treating/packaging machinery, identified as #12, installed in 1994, with a capacity of 33,000 lb/hr, and equipped with one (1) cyclone, identified as #12B, and one (1) bagfilter, identified as #12A, for control. Air from the control units is exhausted inside the building;
- (i) One (1) rebagging unit, identified as #13, installed in 1992, with a maximum capacity of 33,000 lb/hr, and equipped with one cyclone, identified as #13A;
- (j) Twenty (20) storage bins, identified as B-1 through B-20, installed in 1999. Storage bins B1 through B4 have a capacity of 11,000 bushels each; storage bins B-5 through B-8 have a capacity of 15,000 bushels each, storage bins B-9 through B-12 have a capacity of 11,000 bushels each; storage bins B-13 through B-17 have a capacity of 4,600 bushels each; storage bin B-18 has a capacity of 1,200 bushels; storage bin B-19 has a capacity of 1,500 bushels; and storage bin B-20 has a capacity of 250 bushels; and
- (k) One (1) seed corn debagger, identified as EU34, installed in 2002, with a maximum throughput of 56,000 lb/hr. Particulate matter emissions from this debagger are controlled by cartridge filters.

SECTION B GENERAL CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

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

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

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

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

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

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

B.5 Modification to Permit [326 IAC 2]

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

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

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 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.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2]
[IC13-17-3-2] [IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ shall issue a revised permit.

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.12 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 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

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

C.3 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 (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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 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.

Record Keeping and Reporting Requirements

C.10 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.11 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.12 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
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 semi-annual 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 UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) natural gas-fired grain dryers, identified as Dry 2A and Dry 2B, installed in 1976. Each dryer has four (4) burners and a heat input rate of 60 MMBtu/hr and drying rate of 20,238 bushels per batch (Bu/batch);
- (b) Two (2) shellers, identified as #3 and #4, installed in 1991, each with a capacity of 100,800 lb/hr, and equipped with four (4) cyclones, identified as #3A, #3B, #4A, and #4B, for control;
- (c) One (1) ear corn aspirator, identified as #5, installed in 1985, with a capacity of 201,600 pounds per hour (lb/hr), and equipped with one (1) cyclone, identified as #5A, for control;
- (d) One (1) Cimbria Delta 117 corn grain cleaner, identified as #14, installed in 2003, with a capacity of 33,600 lb/hr, and equipped with one (1) cyclone, identified as #14A, and one (1) bagfilter, identified as #14B, for control. Air from the control units is exhausted inside the building;
- (e) One (1) sizing machinery, identified as #7, installed in 1976, with a capacity of 33,600 lb/hr, and equipped with one (1) cyclone, identified as #7A, for control. The air from the control unit is exhausted inside the building;
- (f) Two (2) corn grain Duo-aspirators, identified as #8 and #9, installed in 1976, each with a capacity of 17,000 lb/hr. Duo-aspirator #8 is equipped with one (1) cyclone, identified as #8A, and Duo-aspirator #9 is equipped with one (1) cyclone, identified as #10A, for control;
- (g) Two (2) gravity tables, identified as #10 and #11, installed in 1976, each with a capacity of 14,000 lb/hr, and equipped with two (2) cyclones, identified as #9A and #11A;
- (h) One (1) treating/packaging machinery, identified as #12, installed in 1994, with a capacity of 33,000 lb/hr, and equipped with one (1) cyclone, identified as #12B, and one (1) bagfilter, identified as #12A, for control. Air from the control units is exhausted inside the building;
- (i) One (1) rebagging unit, identified as #13, installed in 1992, with a maximum capacity of 33,000 lb/hr, and equipped with one cyclone, identified as #13A; and
- (j) Twenty (20) storage bins, identified as B-1 through B-20, installed in 1999. Storage bins B1 through B4 have a capacity of 11,000 bushels each; storage bins B-5 through B-8 have a capacity of 15,000 bushels each, storage bins B-9 through B-12 have a capacity of 11,000 bushels each; storage bins B-13 through B-17 have a capacity of 4,600 bushels each; storage bin B-18 has a capacity of 1,200 bushels; storage bin B-19 has a capacity of 1,500 bushels; and storage bin B-20 has a capacity of 250 bushels.
- (k) One (1) seed corn debagger, identified as EU34, installed in 2002, with a maximum throughput of 56,000 lb/hr. Particulate matter emissions from this debagger are controlled by cartridge filters.

(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]

Pursuant to MSOP 073-11846-00035, issued on May 23, 2000, and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the corn processing facilities shall not exceed the following:

<i>Facility/Operation</i>	<i>Process Weight Rate (ton/hr)</i>	<i>Particulate Emission Rate Limit (lb/hr)</i>
Dry 2A	8.25	16.9
Dry 2B	8.25	16.9
Shelling #3 and #4	16.5	26.8
Aspirator #5	16.5	26.8
Grain Cleaner #14	16.5	26.8
Sizing Machinery #7	16.5	26.8
Duo-Aspirator #8	8.25	16.9
Duo-Aspirator #9	8.25	16.9
Gravity Table #10	7.0	15.1
Gravity Table #11	7.0	15.1
Treating/Packaging #12	16.5	26.8
Rebagging	16.5	26.8
Debagger, EU34	28.0	38.2

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour;
 and P = 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 these facilities and their respective control devices.

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

D.1.3 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records of any 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:	Monsanto Company
Address:	15849 South U.S. Highway 231
City:	Remington, Indiana 47977
Phone #:	(219) 261-2122
MSOP #:	MSOP 073-20867-00035

I hereby certify that Monsanto Company is still in operation.
 no longer in operation.

I hereby certify that Monsanto Company is in compliance with the requirements of MSOP 073-20867-00035.
 not in compliance with the requirements of MSOP 073-20867-00035.

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: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

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

Source Background and Description

Source Name:	Monsanto Company
Source Location:	15849 South U.S. Highway 231, Remington, Indiana 47977
County:	Jasper
SIC Code:	0723
Operation Permit No.:	073-11846-00035
Operation Permit Issuance Date:	May 23, 2000
Permit Renewal No.:	073-20867-00035
Permit Reviewer:	Chrystal Wagner

The Office of Air Quality (OAQ) has reviewed an application from Monsanto Company relating to the operation of a hybrid corn seed processing plant.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) natural gas-fired grain dryers, identified as Dry 2A and Dry 2B, installed in 1976. Each dryer has four (4) burners and a heat input rate of 60 MMBtu/hr and drying rate of 20,238 bushels per batch (Bu/batch);
- (b) Two (2) shellers, identified as #3 and #4, installed in 1991, each with a capacity of 100,800 lb/hr, and equipped with four (4) cyclones, identified as #3A, #3B, #4A, and #4B, for control;
- (c) One (1) ear corn aspirator, identified as #5, installed in 1985, with a capacity of 201,600 pounds per hour (lb/hr), and equipped with one (1) cyclone, identified as #5A, for control;
- (d) One (1) Cimbria Delta 117 corn grain cleaner, identified as #14, installed in 2003, with a capacity of 33,600 lb/hr, and equipped with one (1) cyclone, identified as #14A, and one (1) bagfilter, identified as #14B, for control. Air from the control units is exhausted inside the building;
- (e) One (1) sizing machinery, identified as #7, installed in 1976, with a capacity of 33,600 lb/hr, and equipped with one (1) cyclone, identified as #7A, for control. The air from the control unit is exhausted inside the building;
- (f) Two (2) corn grain Duo-aspirators, identified as #8 and #9, installed in 1976, each with a capacity of 17,000 lb/hr. Duo-aspirator #8 is equipped with one (1) cyclone, identified as #8A, and Duo-aspirator #9 is equipped with one (1) cyclone, identified as #10A, for control;
- (g) Two (2) gravity tables, identified as #10 and #11, installed in 1976, each with a capacity of 14,000 lb/hr, and equipped with two (2) cyclones, identified as #9A and #11A;

- (h) One (1) treating/packaging machinery, identified as #12, installed in 1994, with a capacity of 33,000 lb/hr, and equipped with one (1) cyclone, identified as #12B, and one (1) bagfilter, identified as #12A, for control. Air from the control units is exhausted inside the building;
- (i) One (1) rebagging unit, identified as #13, installed in 1992, with a maximum capacity of 33,000 lb/hr, and equipped with one cyclone, identified as #13A;
- (j) Twenty (20) storage bins, identified as B-1 through B-20, installed in 1999. Storage bins B1 through B4 have a capacity of 11,000 bushels each; storage bins B-5 through B-8 have a capacity of 15,000 bushels each, storage bins B-9 through B-12 have a capacity of 11,000 bushels each; storage bins B-13 through B-17 have a capacity of 4,600 bushels each; storage bin B-18 has a capacity of 1,200 bushels; storage bin B-19 has a capacity of 1,500 bushels; and storage bin B-20 has a capacity of 250 bushels; and
- (k) One (1) seed corn debagger, identified as EU34, installed in 2002, with a maximum throughput of 56,000 lb/hr. Particulate matter emissions from this debagger are controlled by cartridge filters.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but no limited to, the following:

- (a) MSOP 073-11846-00035 issued on May 23, 2000;
- (b) Notice Only Change 073-12878-00035 issued on December 18, 2000;
- (c) Minor Permit Revision 073-15514-00035 issued on April 30, 2002; and
- (d) Notice Only Change 073-16958-00035 issued on April 8, 2003.

All conditions from previous approvals were incorporated into this permit except the following:

- (a) MSOP 073-11846-00035 issued on May 23, 2000

Condition D.1.4:

D.1.4 Particulate Matter (PM)

The cyclones and bagfilters shall be in operation at all times whenever the process (corn drying, shelling, aspirator, cleaning and corn sizing), each control device is controlling, is in operation in order to comply with the limit in D.1.1.

Reason not incorporated:

Based on the PTE, each unit is in compliance with the emission rate limit contained in 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) without the use of a control device. Therefore, this condition has not been included in this permit.

- (b) MSOP 073-11846-00035 issued on May 23, 2000

Compliance Determination and Compliance Monitoring Conditions:

Conditions D.1.4 through D.1.8

Reason not incorporated:

Based on the uncontrolled PTE, none of the permitted units needs a control device to comply with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). Therefore, these conditions have not been included in this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
Dry 2A	Corn Dryer	24	5 x 5	475,500	100
Dry 2B	Corn Dryer	24	5 x 5	475,500	100
Cyc-3A	Sheller 3	20	1.05 x 1.9	4,250	Ambient
Cyc-3B	Sheller 3	20	1.05 x 1.9	4,250	Ambient
Cyc-4A	Sheller 4	20	1.05 x 1.9	4,250	Ambient
Cyc-4B	Sheller 4	20	1.08 x 1.9	4,250	Ambient
Cyc-5A	Aspirator 3	20	1.05 x 1.9	5,000	Ambient
Cyc-7A	Sizing Machinery	35.3	2.25	5,000	Ambient
Cyc-8A	Aspirator 8	45	1.4 x 2.5	7,300	Ambient
Cyc-10A	Aspirator 9	43	1.4 x 2.5	7,300	Ambient
Cyc-9A	Gravity Table 10	54	1.7 x 3	14,500	Ambient
Cyc-11A	Gravity Table 11	54	1.7 x 3	14,500	Ambient
Cyc-13A	Rebagging	35.5	1.25	2,100	Ambient
34A	Debagger	10.3	1.13	3,550	70

Recommendation

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

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

A complete application for the purposes of this review was received on February 18, 2005.

Emission Calculations

See Appendix A, pages 1 through 4, 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	102.1
PM-10	39.6
SO ₂	0.3
VOC	2.9
CO	44.2
NO _x	52.6

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) 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 HAP is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Jasper County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NOx) are precursors for the formation of ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Jasper County has been designated as attainment or unclassifiable for ozone. Therefore, VOC 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.
- (b) Jasper County has been classified as attainment or unclassifiable 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.
- (c) Jasper County has been classified as attainment for PM-2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-

2 for PM-2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM-2.5 emissions, it has directed states to regulate PM-10 emissions as surrogate for PM-2.5 emissions. See the State Rule Applicability – Entire Source section.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	25.4
PM-10	10.5
SO ₂	0.3
VOC	2.9
CO	44.2
NO _x	52.6
Single HAP	0.9
Combination HAP	1.0

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the MSOP application submitted by the company.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAP is less than 25 tons per year.

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

Federal Rule Applicability

- (a) This source is not subject to the requirements of the New Source Performance Standard, Standards of Performance for Grain Elevators, 326 IAC 12 (40 CFR 60.300, Subpart DD). This NSPS applies to grain terminal elevators with a permanent storage capacity of 2.5 million U.S. bushels, except those located at animal food manufacturers, breweries, and live-stock feedlots. It also applies to grain storage elevators located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean extraction plant that has a permanent grain storage capacity of 1 million bushels. Monsanto Company is not a wheat flour mill, a wet corn mill, a dry corn mill, nor a soybean oil extraction plant, and has a storage capacity that is less than 1 million bushels. Therefore, NSPS for Grain Elevators, 326 IAC 12 (40 CFR 60.300, Subpart DD) does not apply.
- (b) The two (2) natural gas-fired grain dryers, Dry 2A and Dry 2B, each rated with a maximum heat input capacity of 60.0 MMBtu/hr are not subject to the National Emission Standards

for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63.7480-7575, Subpart DDDDD), NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters, because they are not located at a major source of HAP.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This stationary source was constructed before August 1977. It does not belong to any of the 28 listed source categories. There has been one modification that increased the source PM10 PTE from 9.42 tons per year to 9.46 tons per year. This source is not a major PSD source because no attainment pollutant is emitted at a rate of 250 tons per year or greater. Therefore, 326 IAC 2-2 does not apply.

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

The entire source emits less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAP. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Jasper County and is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Therefore, 326 IAC 2-6 does 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 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to MSOP 073-11846-00035, issued on May 23, 2000, and 326 IAC 6-3-2, particulate from the corn processing facilities shall not exceed the following:

<i>Facility/Operation</i>	<i>Process Weight Rate (ton/hr)</i>	<i>Particulate Emission Rate Limit (lb/hr)</i>
Dry 2A	8.25	16.9
Dry 2B	8.25	16.9
Shelling #3 and #4	16.5	26.8
Aspirator #5	16.5	26.8
Grain Cleaner #14	16.5	26.8
Sizing Machinery #7	16.5	26.8
Duo-Aspirator #8	8.25	16.9
Duo-Aspirator #9	8.25	16.9
Gravity Table #10	7.0	15.1
Gravity Table #11	7.0	15.1
Treating/Packaging #12	16.5	26.8
Rebagging #13	16.5	26.8
Debagger EU34	28.0	38.2

The pounds per hour limitation was calculated with the following equation:

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

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

Based on the PTE before controls, each unit is in compliance with the emission rate limit contained in 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Compliance Requirements

All state and federal rules contain compliance provisions. However, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

Conclusion

The operation of this hybrid corn seed processing plant shall be subject to the conditions of the Minor Source Operating Permit 073-20867-00035.

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

Company Name: Monsanto Company
Address City IN Zip: 15849 South U.S. Highway 231, Remington, Indiana 47977
Permit Number: MSOP 073-20867-00035
Plt ID: 073-00035
Reviewer: Chrystal Wagner
Date: June 10, 2005

Grain Dryers Dry 2A and Dry 2B
Each rated at 60.0 mmBtu/hr

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

120.0

1051.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	1.0	4.0	0.3	52.6	2.9	44.2

*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 HAP emissions calculations.

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

Company Name: Monsanto Company
Address City IN Zip: 15849 South U.S. Highway 231, Remington, Indiana 47977
Permit Number: MSOP 073-20867-00035
Pit ID: 073-00035
Reviewer: Chrystal Wagner
Date: June 2, 2005

HAP - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.104E-03	6.307E-04	3.942E-02	9.461E-01	1.787E-03

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

Methodology is the same as page 1.

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

**Appendix A: Emissions Calculations
Corn Processing**

Monsanto Company
15849 South U.S. Highway 231, Remington, Indiana 47977
Permit Number: MSOP 073-20867-00035
Pit ID: 073-00035
Reviewer: Chrystal Wagner
Date: June 10, 2005

Facility/Operation	Throughput (lb/hr)	Emission Factor* (lb/ton)	PM Emissions (uncontrolled) (ton/yr)	PM10 Emissions (uncontrolled) (ton/yr)	Efficiency of Control Device	PM Emissions (ton/yr)	PM10 Emissions (ton/yr)
Ear Corn Dryer 2A	16500	PM = 0.22 PM10 = .055	7.95	1.99	0.00%	7.95	1.99
Ear Corn Dryer 2B	16500	PM = 0.22 PM10 = .055	7.95	1.99	0.00%	7.95	1.99
Shelling #3 and #4 ¹	33000	PM10 = 25%PM	18.52	4.63	93.90%	1.13	0.28
Aspirator #5	33000	PM = 0.061 PM10 = .034	4.41	2.46	93.90%	0.27	0.15
Corn Grain Cleaner #14 ²	33000	PM = 0.375 PM10 = 0.095	27.10	6.87	80.00%	5.42	1.37
Duo-Aspirator #8	33000	PM = 0.061 PM10 = .034	4.41	2.46	93.90%	0.27	0.15
Duo-Aspirator #9	33000	PM = 0.061 PM10 = .034	4.41	2.46	93.90%	0.27	0.15
Gravity Table #10	14000	PM = 0.061 PM10 = .034	1.87	1.04	93.90%	0.11	0.06
Gravity Table #11	14000	PM = 0.061 PM10 = .034	1.87	1.04	93.90%	0.11	0.06
Corn Sizing #7 ³	33000	PM10 = 25%PM	6.20	1.55	93.90%	0.38	0.10
Treating/Packaging #12	33000	PM = 0.061 PM10 = .034	4.41	2.46	99.40%	0.03	0.01
Rebagging #13	33000	PM = 0.061 PM10 = .034	4.41	2.46	93.90%	0.27	0.15
Debagger EU34	56000	PM = 0.061 PM10 = 0.034	7.48	4.17	99.00%	0.07	0.04
TOTAL EMISSIONS			100.98	35.56		24.23	6.51

Methodology

*Efs based on AP-42, Section 9.9.1.

PM Emissions = Throughput, lb/hr * Ef, lb/ton * ton/2000 lb * 8760 hr/yr

PM10 Emissions = 25%(PM Emissions)

¹Shelling PM Emissions = Cyc-3A, 3B, 4A, 4B, 5A air flow rate, ft³/min * cyclone grain loading, gr/ft³ * lb/7000gr * ton/2000 lb * 60 min/hr * 8760 hr/yr
= 5000 cuft/min * 0.006 gr/cuft * 1/7000 lb/gr * 1/2000 lb/ton * 60 min/hr * 8760 hr/yr

²Grain Cleaner PM Emission Factor = 0.375 lb/ton PM, PM10 Emission Factor = 0.095 lb/ton PM10, Cyclone Control Efficiency = 80%, as provided by the source.

³Sizing PM Emissions = Cyc-7A, air flow rate, ft³/min * cyclone grain loading, gr/ft³ * lb/7000 gr * ton/2000 lb * 60 min/hr * 8760 hr/yr
= 5000 cuft/min * 0.002 gr/cuft * 1/7000 lb/gr * 1/2000 lb/ton * 60 min/hr * 8760 hr/yr

**Appendix A: Emissions Calculations
Grain Storage Bins**

**Monsanto Company
15849 South U.S. Highway 231, Remington, Indiana 47977
Permit Number: MSOP 073-20867-00035
Pit ID: 073-00035
Reviewer: Chrystal Wagner
Date: June 10, 2005**

Facility/Operation	Capacity (bushels)	Emission Factor (lb/ton)	PM Emissions (ton/yr)	PM10 Emissions (ton/yr)
Storage Bins B-1 through B-4	11000	PM = 0.025 PM10 = .0063	0.03	0.01
Storage Bins B-5 through B-8	15000	PM = 0.025 PM10 = .0063	0.04	0.01
Storage Bins B-9 through B-12	11000	PM = 0.025 PM10 = .0063	0.03	0.01
Storage Bins B-13 through B-17	4600	PM = 0.025 PM10 = .0063	0.02	0.00
Storage Bin B-18	1200	PM = 0.025 PM10 = .0063	0.00	0.00
Storage Bin B-19	1500	PM = 0.025 PM10 = .0063	0.00	0.00
Storage Bin B-20	250	PM = 0.025 PM10 = .0063	0.00	0.00
TOTAL EMISSIONS			0.12	0.03

Methodology

AP-42, Chapter 9, Section 9, Tables 9.9.1-1 and 9.9.1-2

PM Emissions = Capacity, bushels * .02799 tons grain/bushel * Ef, lb/ton * ton/2000 lb * 2 fills/yr