



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: July 21, 2005  
RE: Bunge North America (east) , Inc / 145-21206-00035  
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



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

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Mr. Pat Mcnamara  
Bunge North America (East), Inc.  
700 North Rangeline Road  
P.O. Box 860  
Morristown, Indiana 46161

July 21, 2005

Re: 145-21206  
Significant Source Modification to:  
Part 70 permit No.: T145-9004-00035

Dear Mr. Mcnamara:

Bunge North America (East), Inc. was issued Part 70 operating permit T145-9004-00035 on June 29, 2004, for a soybean processing facility. An application to modify the source was received on May 16, 2005. The modification consists of a replacement of some existing pellet mill equipment with a new pellet mill, pellet cooler and high efficiency cyclone with fan under Condition D.6 of their Title V operating permit. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

1. One (1) pelletizing mill, labeled as part of EU# 26, with a maximum rate of 36,000 lbs raw material per hour (18 tph).
2. One (1) pellet cooler, labeled as part of EU# 26, with a maximum rate of 36,000 lbs raw material per hour (18 tph), using a high efficiency cyclone control device with a rating of 0.01 grains/dscf and 7,500 acfm at stack Pt#26.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027 and ask for Lawrence Stapf extension 2-8427, or directly dial (317) 232-8427.

Sincerely,  
Original signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

LWS

cc: File - Shelby County  
Shelby County Health Department  
Air Compliance Section Inspector: D.J. Knotts  
Compliance Data Section  
Administrative and Development



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## **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Bunge North America (East), Inc.  
700 N. Rangeline Road  
Morristown, Indiana 46161-0860**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

First Significant Source Modification 145-21206-00035	
Original signed by:  Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: July 21, 2005

## Construction Conditions

### General Construction Conditions

#### 1 Permit No Defense

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

### Effective Date of the Permit

#### 2 Effective Date of the Permit [IC13-15-5-3]

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

#### 3 Modification to Construction Requirements

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All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

#### 4 Revocation of Permits

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

#### 5 First Time Operation Permit

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This Section of this Permit shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration & Development Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit or Construction is postmarked or hand delivered to IDEM.

- (b) If Construction is complete in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

### C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the

Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
  - (1) Prior to commencing the construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;
      - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(3); and
      - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
  - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

## SECTION D.6

## FACILITY CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (q) One (1) pelletizing mill, labeled as part of EU# 26, with a maximum rate of 36,000 lbs raw material per hour (18 tph) where air stream from mill does not vent to atmosphere but instead passes on to pellet cooler;
- (r) One (1) pellet cooler, labeled as part of EU# 26, with a maximum rate of 36,000 lbs raw material per hour (18 tph), using a high efficiency cyclone control device with a rating of 0.01 grains/dscf and 7,500 acfm at stack Pt#26;

...

(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 2-7-5(1)]

#### D.6.1 Particulate Emissions Limitations [326 IAC 6-3-2] [40 CFR 52.21, Part P]

Pursuant to 326 IAC 6-3-2 the Particulate emissions from the Pellet Cooling facility shall be limited to 28.4 pounds per hour at a process weight rate of 36,000 pounds per hour:

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:

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

#### D.6.2 PSD Minor Limit [326 IAC 2-2]

Pursuant to 326 IAC 2-2 the Particulate Matter (PM) and particulate matter with aerodynamic diameter less than ten (10) micrometers ( $PM_{10}$ ) emissions from the emission unit, EU#26 shall be limited to 2.74 and 1.37 lbs/hour, respectively.

Compliance with this condition is necessary in order to limit emissions to less than 25 tons/year PM and less than 15 tons/year  $PM_{10}$  and will render the requirements of 326 IAC 2-2 not applicable to the Pellet Mill and Cooler emission unit, EU#26.

#### D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.6.4 Particulate Control

In order to comply with D.6.1 and D.6.2, the cyclone for particulate control shall be in operation and control emissions from the Pellet Cooler at all times that the Pellet Mill/Cooler process is in operation.

#### D.6.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 60 days after achieving the maximum production rate for emission unit EU#26 but no later

than 180 days after startup of the emission unit, the Permittee shall perform PM and PM<sub>10</sub> testing in order to determine compliance with D.6.1 and D.6.2 utilizing methods as approved by the Commissioner, and furnish the Commissioner a written report of the results of such performance tests.

These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>. Testing shall be conducted in accordance with Section C – Performance Testing.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.6.6 Visible Emissions Notations**

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

#### **D.6.7 Cyclone Inspections**

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An external inspection shall be performed each calendar quarter and an internal inspection shall be performed each calendar year of the cyclone controlling the Pellet Mill /Cooler process. Inspections required by this condition shall not be performed during consecutive months.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.6.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.6.6, the Permittee shall maintain records of visible emission notations of the Pellet Cooling stack exhaust once per day.
- (b) To document compliance with Condition D.6.7, the Permittee shall maintain records of the results of the inspections required under Condition D.6.7.
- (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

### Addendum to the Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit

#### Source Background and Description

Source Name:	Bunge North America (East), Inc.
Source Location:	700 North Rangeline Road, Morristown, Indiana 46161
County:	Shelby
SIC Code:	4911
Operation Permit No.:	T145 -9004-00035
Operation Permit Issuance Date:	June 29, 2004
Significant Source Modification No.:	145 -21206 -00035
Significant Permit Modification No.:	145 -21327 -00035
Permit Reviewer:	LStapf

On June 10, 2005, the Office of Air Quality (OAQ) had a notice published in the local newspaper in Shelby County, stating that Bunge North America (East), Inc. (Bunge) had applied for a Significant Permit Modification to an operating permit to be able to replace some existing pellet mill equipment with a new pellet mill, pellet cooler and high efficiency cyclone with fan in order to increase the current process rate. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 8, 2005, Bunge submitted comments on the proposed Significant Permit Modification. Comments were accepted from John Gibbons of Bunge. The summary of the comments is as follows. **Bold** text has been added while text with a line through it has been ~~deleted~~. The Table of Contents of the permit was updated as needed.

#### Comment 1:

**“Section D.6 – Facility Description (q):** One (1) pelletizing/~~extruding~~ mill, ..... raw material per hour (18 tph) ~~using a cyclone control device with a rating of 0.01 gr/dscf and 7,500 acfm at stack #26.~~ Please remove the lined-out items.”

#### Response to Comment 1:

The process flow diagram in the application and a conversation with the source has shown that the air from the pelletizing mill goes directly to the next piece of equipment labeled the pellet cooler. IDEM OAQ agrees that the description should not include the cyclone when referring about the pelletizing mill. Therefore, the description has been modified as follows:

## SECTION D.6

## FACILITY CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (q) One (1) pelletizing/~~extruding~~ mill, labeled as part of EU# 26, with a maximum rate of 36,000 lbs raw material per hour (18 tph), ~~using a cyclone control device with a rating of 0.01 grains/dscf and 7,500 acfm at stack Pt#26.~~ **where air stream from mill does not vent to atmosphere but instead passes on to pellet cooler;**
- (r) One (1) pellet cooler, labeled as part of EU# 26, with a maximum rate of 36,000 lbs raw material per hour (18 tph), using a high efficiency cyclone control device with a rating of 0.01 grains/dscf and 7,500 acfm at stack Pt#26;
- (s) One (1) totally enclosed drag conveyor, with a maximum rate of 15 tons per hour;
- (t) One (1) totally enclosed "L" path conveyor, with a maximum rate of 15 tons per hour; and
- (u) One (1) bucket leg, with a maximum rate of 15 tons per hour.

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

### D.6.4 Particulate Control

In order to comply with D.6.1 and D.6.2, the cyclone for particulate control shall be in operation and control emissions from the **Pellet Cooler** ~~eyelone~~ at all times that the **Pellet Mill/Cooler process Cooling Line is** are in operation.

### Comment 2:

**"Section D.6.1- Particulate Emission Limitations:** the process weight rate of 26,000 pounds per hour needs to be changed to 36,000 pounds per hour."

### Response to Comment 2:

There is a typographical error: "26,000" should be "36,000" based on the process rate of 18 tph. The text will be revised. The emission limitation of 28.4 lbs / hour is still consistent with the formula and process rate. The text shall be revised as follows:

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.6.1 Particulate Emissions Limitations [326 IAC 6-3-2] [40 CFR 52.21, Part P]

Pursuant to 326 IAC 6-3-2 the Particulate emissions from the Pellet Cooling facility shall be limited to 28.4 pounds per hour at a process weight rate of ~~26,000~~ **36,000** pounds per hour:

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

### Comment 3:

**"Section D.6.2 – PSD Minor Limit:**

- a. the section lists the PM and PM10 emission limits as 2.73 and 1.36 lb/hr, respectively. The correct emission limits are '2.74 (PM)' and '1.37 (PM10)' lb/hr. The difference is caused by rounding error.
- b. In the second paragraph, please change 'Cooling Line' to 'Cooler'."

**Response to Comment 3:**

The text will be revised as follows:

**D.6.2 PSD Minor Limit [326 IAC 2-2]**

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Pursuant to 326 IAC 2-2 the Particulate Matter (PM) and particulate matter with aerodynamic diameter less than ten (10) micrometers (PM<sub>10</sub>) emissions from the emission unit, EU#26 shall be limited to ~~2.73~~ **2.74** and ~~1.36~~ **1.37** lbs/hour, respectively.

Compliance with this **condition is necessary in order to** emission limit is equivalent to emissions of **to** less than 25 tons/year PM and less than 15 tons/year PM<sub>10</sub> and will render the requirements of ~~326~~ **26** IAC 2-2 not applicable to the Pellet Mill and ~~Cooling Line~~ **Cooler** emission unit, EU#26.

**Comment 4:**

**"Section D.6.7 – Cyclone Inspections:** change 'Pellet Cooling' process to 'Pellet Mill/Cooler' process. "

**Response to Comment 4:**

The text shall be revised as follows:

**D.6.4 Particulate Control**

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In order to comply with D.6.1 and D.6.2, the cyclone for particulate control shall be in operation and control emissions from the **Pellet Cooler** cyclone at all times that the **Pellet Mill/Cooler process** ~~Cooling Line~~ **is** are in operation.

...

**D.6.7 Cyclone Inspections**

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An external inspection shall be performed each ~~calendar~~ **calendar** quarter and an internal inspection shall be performed each ~~calendar~~ **calendar** year of the cyclone controlling the Pellet **Mill /Cooling Line** **Cooler** process. Inspections required by this condition shall not be performed during consecutive months.

**Comment 5:**

**"Section D.6.8(a) – Recordkeeping Requirements:** change 'once per shift' to 'once per day'. "

**Response to Comment 5:**

The OAQ has determined that the frequency of monitoring can be changed from once per shift to once per day and the source will still demonstrate compliance with the applicable provisions. Therefore, Conditions D.6.6 and D.6.8 have been revised to require daily rather than once per shift visible emissions notations:

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.6.6 Visible Emissions Notations**

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

...

#### D.6.8 Record Keeping Requirements

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- (a) To document compliance with Condition D.6.6, the Permittee shall maintain records of visible emission notations of the Pellet Cooling stack exhaust once per **day** shift.

#### Comment 6:

**“Section D.6.8(b) – Recordkeeping Requirements:** Bunge would like further explanation on what is meant by the statement ‘the dates the vents are redirected’. This phrase seems to be out of place.”

#### Response to Comment 6:

IDEM OAQ normally includes the phrase ‘the dates the vents are redirected’ to refer to a baghouse that can sometimes exhaust inside and sometimes outside. The Permittee proposes the use of a cyclone that will always exhaust outside of the building through stack #26. Therefore the phrase referring to ‘the dates the vents are redirected’ has been deleted. Section D.6.8 shall be revised as follows:

#### D.6.8 Record Keeping Requirements

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- (a) To document compliance with Condition D.6.6, the Permittee shall maintain records of visible emission notations of the Pellet Cooling stack exhaust once per **day** shift.
- (b) To document compliance with Condition D.6.7, the Permittee shall maintain records of the results of the inspections required under Condition D.6.7. ~~and dates that the vents are redirected.~~
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### Comment 7:

“Any changes already made in the Permit need to also be made in the Technical Source Document.”

#### Response to Comment 7:

IDEM OAQ will not revise the historical Technical Support Document. The changes required shall be reflected in the addendum to the TSD.

#### Comment 8:

**“History:** Bunge is now operating under the Stay Agreement between Bunge North America (East), Inc. and IDEM – Exhibit A: Stay for T145-9004-00035 issued on June 1, 2005. This reference should be made in the TSD.”

#### Response to Comment 8:

Please refer to Response to Comment 7 and 9.

#### Comment 9:

**“Changes Proposed to Title V Permit (starting on Page 7 of 10):** Exhibit A of the Appeal resolution needs to be reviewed to ensure that the changes to the Title V proposed in this TSD document are consistent.

- a. **Facility Description (q):** make the same changes listed in Comment #1 above.

- b. Section D.6 – Facility Description (q):** make the same changes listed in Comment #1 above.
- c. Section D.6.1 – Particulate Emissions Limitations:** make the same changes listed in Comment #2 above.
- d. Section D.6.2 – PSD Minor Limit:** make the same changes listed in Comment #3 above.
- e. Section D.6.7 – Cyclone Inspections:** make the same changes listed in Comment #4 above.
- f. Section D.6.8(a) – Recordkeeping Requirements:** make the same changes listed in Comment #5 above.
- g. Section D.6.8(b) – Recordkeeping Requirements:** make the same changes listed in Comment #6 above. “

#### **Response to Comment 9:**

This permit modification 145-21327-00035 is expected to be issued as final well before the appeal resolution is issued final under 145-19796-00035. Because the appeal resolution is not final, those changes agreed upon may not be placed in this permit modification. Further, this permit modification is limited to only the equipment listed in Condition D.6 of the operating permit. If the resolution is released after this permit modification, the appeal resolution may incorporate the Condition D.6 changes summarized here.

#### **Comment 10:**

**“Appendix A:** Why is ‘Enclosed Hull Handling Conveyor’ and ‘Pellet ‘L’ Conveyor & Storage’ listed in the Appendix A tables? These conveyors are not new but are existing. It seems unnecessary to show them in the table especially since they don’t have any emissions. Do you agree? “

#### **Response to Comment 10:**

Appendix A is part of the historical TSD and the IDEM OAQ documents here in the Addendum to the TSD that the ‘Enclosed Hull Handling Conveyor’ and ‘Pellet ‘L’ Conveyor & Storage’ operations are not modified under this SSM 145-21206-00035 and SPM 145-21327-00035.

#### **Changes:**

In general, the TSD is not to be modified and re-issued. The TSD is a historical document and reference. Those necessary changes to the TSD are noted in this addendum.

There is an error in the TSD section entitled ‘Justification for Modification’ referring to a minor permit modification. This is a significant permit modification. The TSD section should read as follows:

“The significant source modification (145-21206-00035) will be incorporated into the Part 70 permit (145-9004-00035) through **significant** ~~minor~~ permit modification (145-21327-00035) for the source to operate the new emission unit.”

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

**Technical Support Document (TSD)  
Significant Source Modification and  
Significant Permit Modification to a Part 70 Operating Permit**

**Source Background and Description**

Source Name:	Bunge North America (East), LLC
Source Address:	700 N. Rangeline Road, Morristown, Indiana 46161
SIC Code:	2075, 2079
County Location:	Shelby
Source Location Status:	Non-attainment for 8-hour ozone; attainment for PM <sub>2.5</sub> ; Attainment or unclassified for all remaining criteria pollutants
Operation Permit No.:	T145-9004-00035, issued on June 29, 2004
First Significant Source Modification No.:	145-21206-00035
First Significant Permit Modification No.:	145-21327-00035
Permit Writer:	LStapf
Source Status:	Part 70 Permit Program Major Source under Non-attainment NSR Rules Major Source under Attainment PSD Rules Major Source, Section 112 of the Clean Air Act Not one of the 28 listed source categories

**History**

On May 16, 2005, the Office of Air Quality (OAQ) received an application for a significant source modification and a significant permit modification from Bunge North America (East), LLC to be able to replace an existing pellet mill with a new unit with increased capacity. This project is labeled the "Pellet Mill/Cooler Project".

The source is currently permitted under Part 70 Permit T145-9004-00035, issued on June 29, 2004.

**New Emission Units and Pollution Control Equipment**

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

- (a) One (1) pelletizing/extruding mill, labeled as part of EU# 26, with a maximum rate of 36,000 lbs raw material per hour (18 tph), using a cyclone control device with a rating of 0.01 grains/dscf and 7,500 acfm at stack Pt#26.
- (b) One (1) pellet cooler, labeled as part of EU# 26, with a maximum rate of 36,000 lbs raw material per hour (18 tph), using a high efficiency cyclone control device with a rating of 0.01 grains/dscf and 7,500 acfm at stack Pt#26.

**Enforcement Issues**

There are no enforcement issues for this source.

**Recommendation**

The staff recommends to the Commissioner that this Significant Source Modification and Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on May 16, 2005.

### Emission Calculations

The source provided calculations are provided in Appendix A of this document (Appendix A, page 1.)

### Potential To Emit of Modification 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.”

This table reflects the PTE before controls for the modification. Control equipment is not federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential to Emit (tons/yr)
PM	239
PM <sub>10</sub>	120
SO <sub>2</sub>	0
VOC	0
CO	0
NO <sub>x</sub>	0
Single highest HAP	0
Total HAPs	0

### Justification for Modification

This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4)(A) because this emission unit has the potential to emit more than 25 tons per year of particulate matter (PM) or particulate matter with aerodynamic diameter less than or equal to ten (10) micrometers (PM<sub>10</sub>). Therefore, the Title V permit is being modified through a Significant Permit Modification pursuant to 326 IAC 2-7-12(d).

The Significant Source Modification (145-21206-00035) will be incorporated into the Part 70 permit (145-9004-00035) through Minor Permit Modification (145-21327-00035) for the source to operate the new emission unit.

### County Attainment Status

The source is located in Shelby County.

County Attainment Status	
Pollutant	Status
PM <sub>10</sub>	Attainment
PM <sub>2.5</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-Hour Ozone	Attainment
8-Hour Ozone	Non-Attainment
CO	Attainment

- (a) Shelby County has been classified as non-attainment 8-hour ozone (effective April 30, 2004). Therefore, volatile organic compound (VOC) and oxides of nitrogen (NO<sub>x</sub>) emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Shelby County has been classified as attainment or unclassifiable for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, 1 hour ozone, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Shelby County has been classified as attainment for PM<sub>2.5</sub> (effective April 5, 2005). U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions. Therefore, these proposed increases in particulate matter emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Source Status

The existing source PSD and Emission Offset (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (ton/year)
PM	Greater than 250
PM <sub>10</sub>	Greater than 250
SO <sub>2</sub>	Less than 250
NO <sub>x</sub>	Less than 250
VOC	Greater than 100
CO	Less than 250

The source is a major stationary source for non-attainment NSR (Emission Offset) because VOC as a precursor to ozone is emitted at a rate of more than 100 tons per year. The source is not one of the 28 listed source categories. The existing source is a major stationary source for PSD purposes because at least one of the attainment pollutants is emitted at a rate of greater than 250 tons per year.

### Potential to Emit of Modification after Issuance

The table below summarizes the emissions from the modification after controls, reflecting all limits, of the emission unit. Any control equipment is considered enforceable only after issuance of the original Part 70 Operating permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)	
	PM	PM <sub>10</sub>
Controlled Emissions from EU#26	12.0	6.0
Significance Level	25	15

This modification to an existing major stationary source is not major because the PM and PM<sub>10</sub> emissions increases due to the modification are less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply to this modification.

### Federal Rule Applicability

- (a) 40 CFR 64 Compliance Assurance Monitoring  
This significant modification does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for particulate mater (PM<sub>10</sub>):
- (1) with the potential to emit before controls equal to or greater than the major source threshold for particulate mater (PM<sub>10</sub>)
  - (2) that is subject to an emission limitation or standard for particulate mater (PM<sub>10</sub>), and
  - (3) uses a control device as defined in 40CFR Part 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to this modification.

The pollutant-specific emission unit is not a "large unit" as described in 40 CFR 64.5. Therefore, the owner or operator shall submit a CAM plan pursuant to 40 CFR 64 as part of the Part 70 renewal application.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit modification. Specifically, 40 CFR 60, Subpart DD (Standards of Performance for Grain Elevators) does not apply to this modification of this source, because the emission units are not part of the grain elevator.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit modification. Specifically, 40 CFR 63, Subpart GGGG (National Emission Standards for Hazardous Air Pollutants: Solvent Extraction for Vegetable Oil Production) does not apply to this modification of this source, because no HAPs are emitted from the emission unit.

## State Rule Applicability - Individual Facilities

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

This existing source is a major source for PSD. Pursuant to 326 2-2-2(d), this modification is not a major PSD modification because it does not cause a significant emission increase. The applicant has stated that the actual-to-projected-actual applicability test indicates that the modification to the source will not exceed the significance level for particulate matter (PM) or for particulate matter with aerodynamic diameter less than or equal to ten (10) micrometers (PM<sub>10</sub>). This project will be minor for PSD through issuance of a PSD Minor Limit for PM and PM<sub>10</sub>. The Minor Limit shall be demonstrated through the following record keeping requirements:

1. 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.
2. Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
3. If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
  - (a) Prior to commencing the construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
    - (1) A description of the project.
    - (2) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (3) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (A) Baseline actual emissions;
      - (B) Projected actual emissions;
      - (C) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(3); and
      - (D) An explanation for why the amount was excluded, and any netting calculations, if applicable.
  - (b) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (c) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

### 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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

1. 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.
2. 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.

### 40 CFR 52 Subpart P (Particulate Emissions Limitations for Manufacturing Processes)

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Pursuant to 40 CFR 52.21 Subpart P, the Particulate Matter emissions from the Pellet Cooling facility shall be limited to 28.4 pounds per hour at a process weight rate of 36,000 pounds per hour (18 tph):

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:

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

### Testing Requirements

The emission unit, EU#26, consisting of the existing and new equipment, will be stack tested for particulate matter (PM) and for particulate matter with aerodynamic diameter less than ten (10) micrometers (PM<sub>10</sub>), because the high efficiency cyclone control device is used to comply with the PM and PM<sub>10</sub> emissions limit.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. 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 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 emission unit are as follows:

- (a) Visible emission notations;

- (b) Inspection results;
- (c) Record keeping of the actual-to-projected-actual applicability test; and

### Changes Proposed

The following are the proposed changes to the Part 70 Operating Permit T145-9004-00035, issued on June 29, 2004, due to the proposed significant source modification (any changes are shown in **bold** or ~~strikeout~~ fonts for emphasis):

- (1) Section A.2, p. 13, of the Part 70 Permit has been revised as follows:

- ~~(q) One (1) pelletizing/extruding mill, with a maximum rate of 5 tons per hour~~
- (q) One (1) pelletizing/extruding mill, labeled as part of EU# 26, with a maximum rate of 36,000 lbs raw material per hour (18 tph), using a cyclone control device with a rating of 0.01 grains/dscf and 7,500 acfm at stack Pt#26;**
- ~~(r) One (1) pellet cooler, with a maximum rate of 5 tons per hour. This process is controlled by a high efficiency cyclone~~
- (r) One (1) pellet cooler, labeled as part of EU# 26, with a maximum rate of 36,000 lbs raw material per hour (18 tph), using a high efficiency cyclone control device with a rating of 0.01 grains/dscf and 7,500 acfm at stack Pt#26;**

- (3) Section A.2, p. 34-35, of the Part 70 Permit has been revised as follows:

#### C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:**
  - (1) Prior to commencing the construction of the “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:**
    - (A) A description of the project.**
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.**

- (C) **A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**
- (i) **Baseline actual emissions;**
  - (ii) **Projected actual emissions;**
  - (iii) **Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(3); and**
  - (iv) **An explanation for why the amount was excluded, and any netting calculations, if applicable.**
- (2) **Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and**
- (3) **Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.**

(4) Section D.6, pp. 68-69, of the Part 70 Permit has been revised as follows:

#### **SECTION D.6 FACILITY CONDITIONS**

##### **Facility Description [326 IAC 2-7-5(15)]:**

- (q) ~~One (1) pelletizing/extruding mill, with a maximum rate of 5 tons per hour~~  
**(q) One (1) pelletizing/extruding mill, labeled as part of EU# 26, with a maximum rate of 36,000 lbs raw material per hour (18 tph), using a cyclone control device with a rating of 0.01 grains/dscf and 7,500 acfm at stack Pt#26;**
- (r) ~~One (1) pellet cooler, with a maximum rate of 5 tons per hour. This process is controlled by a high efficiency cyclone~~  
**(r) One (1) pellet cooler, labeled as part of EU# 26, with a maximum rate of 36,000 lbs raw material per hour (18 tph), using a high efficiency cyclone control device with a rating of 0.01 grains/dscf and 7,500 acfm at stack Pt#26;**
- (.....)

##### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

###### **D.6.1 Particulate Emissions Limitations [326 IAC 6-3-2] [40 CFR 52.21, Part P]**

Pursuant to 326 IAC 6-3-2 the Particulate emissions from the Pellet Cooling facility shall be limited to ~~42.05~~**28.4** pounds per hour at a process weight rate of ~~40~~**26,000** pounds per hour:

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.6.2 PSD Minor Limit [326 IAC 2-2]**

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**Pursuant to 326 IAC 2-2 the Particulate Matter (PM) and particulate matter with aerodynamic diameter less than ten (10) micrometers (PM<sub>10</sub>) emissions from the emission unit, EU#26 shall be limited to 2.73 and 1.36 lbs/hour, respectively.**

**Compliance with this emission limit is equivalent to emissions of less than 25 tons/year PM and less than 15 tons/year PM<sub>10</sub> and will render the requirements of 26 IAC 2-2 not applicable to the Pellet Mill and Cooling Line emission unit, EU#26.**

#### **D.6.23 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

### **Compliance Determination Requirements**

#### **D.6.34 Particulate Control**

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**In order to comply with D.6.1 and D.6.2, the cyclone for particulate control shall be in operation and control emissions from the cyclone at all times that the Pellet Cooling Line are in operation.** ~~The cyclone shall be in operation at all times when the Pellet Milling / Cooling process is in operation.~~

### **Testing Requirements**

#### **D.6.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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**Within 60 days after achieving the maximum production rate for emission unit EU#26 but no later than 180 days after startup of the emission unit, the Permittee shall perform PM and PM<sub>10</sub> testing in order to determine compliance with D.6.1 and D.6.2 utilizing methods as approved by the Commissioner, and furnish the Commissioner a written report of the results of such performance tests.**

**These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>. Testing shall be conducted in accordance with Section C – Performance Testing.**

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.6.46 Visible Emissions Notations**

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

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

#### **D.6.57 Cyclone Inspections**

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An external inspection shall be performed each calendar quarter and an internal inspection shall be performed each calendar year of the cyclone controlling the Pellet Cooling process. Inspections required by this condition shall not be performed during consecutive months.

#### **D.6.6 Cyclone Failure Detection**

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~~In the event that cyclone failure has been observed:~~

~~Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.6.78 Record Keeping Requirements**

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- (a) To document compliance with Condition D.6.46, the Permittee shall maintain records of visible emission notations of the Pellet Cooling stack exhaust once per shift.
- (b) To document compliance with Condition D.6.57, the Permittee shall maintain records of the results of the inspections required under Condition D.6.57 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

[End of permit changes]

### **Conclusions**

The modification to the existing operating permit T145-9004-00035 shall be subject to the conditions of the attached proposed Significant Source Modification No. **145-21206-00035** and Significant Permit Modification No. **145-21327-00035**.

**Appendix A:  
Emission Calculations  
Soybean Pellet Mill and Cooler**

**Company Name:** Bunge North America (East), Inc.  
**Location:** Morristown, Indiana  
**Permit Number:** 1145-21206-00035 and 145-21327-00035  
**Pit ID:** 145-00035  
**Calculated by:** Bunge North America (East), Inc.  
**Date:** June 3, 2005

**Total Particulate Matter Summary**

Process	Controlled			Uncontrolled	
	EF (lb / ton) <sup>A</sup>	(lb / hr) <sup>D</sup>	(ton / yr) <sup>C</sup>	(lb / hr) <sup>B</sup>	(ton / yr) <sup>C</sup>
Enclosed Hull Handling Conveyor	0	0	0	0	0
Pellet Cooler	0.1516	2.73	12.0	54.58	239.0
Pellet "L" Conveyor / Storage	0	0	0	0	0

<sup>A</sup> The emission factor is from AP-42 (Fifth Edition), Table 9.9.1-2. Uses high eff. cyclone control device.

<sup>B</sup> Where (uncontrolled emissions) = 100\* (controlled emissions) / (100 - control eff) ; uses control eff of 95%.

<sup>C</sup> Annual emissions (ton/yr) = emissions (lb/hr) \* schedule (hr/yr) / [ 2000 (lb/ton)] ; uses schedule 8760 (hr/yr).

<sup>D</sup> Emissions (lb/hr) = EF (lb/ton prod) \* throughput 18.0 (tons/hour)

**PM-10 Summary**

Process	Controlled			Uncontrolled	
	EF (lb / ton) <sup>A</sup>	(lb / hr) <sup>D</sup>	(ton / yr) <sup>C</sup>	(lb / hr) <sup>B</sup>	(ton / yr) <sup>C</sup>
Enclosed Hull Handling Conveyor	0	0	0	0	0
Pellet Cooler	0.0758	1.36	6.0	27.29	119.5
Pellet "L" Conveyor / Storage	0	0	0	0	0

<sup>A</sup> The emission factor is from AP-42 (Fifth Edition), Table 9.9.1-2. Uses high eff. cyclone control device.

<sup>B</sup> Where (uncontrolled emissions) = 100\* (controlled emissions) / (100 - control eff) ; uses control eff of 95%.

<sup>C</sup> Annual emissions (ton/yr) = emissions (lb/hr) \* schedule (hr/yr) / [ 2000 (lb/ton)] ; uses schedule 8760 (hr/yr).

<sup>D</sup> Emissions (lb/hr) = EF (lb/ton prod) \* throughput 18.0 (tons/hour)