



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: October 17, 2005
RE: Monsanto Company / 073-21252-00035
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 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: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 3, 2005 Expiration Date: August 3, 2010

First Significant Permit Revision SPR 073-21252-00035	Affected Conditions: A.2, D.1
Issued by: Original Signed By: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: October 17, 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, and modified in 2005, with a capacity of 134,400 lb/hr, equipped with a baghouse dust collector as control, and exhausting to stack #14;
- (i) One (1) rebagging unit, identified as #13, installed in 1992, and modified in 2005, with a maximum capacity of 114,800 lb/hr, equipped with a baghouse dust collector as control, and exhausting to stack #14;
- (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; and
- (l) One (1) small lot bagging operation, installed in 2005, consisting of bagging unit #1 (EU100), bagging unit #2 (EU104), a seed pack fill (EU101), the CBT-100 treater (EU102) and aspirator (EU103), with a total maximum capacity of 198,800 lb/hour, equipped with a baghouse dust collector as control, and exhausting to stack #14.

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, and modified in 2005, with a capacity of 134,400 lb/hr, equipped with a baghouse dust collector as control, and exhausting to stack #14;
- (i) One (1) rebagging unit, identified as #13, installed in 1992, and modified in 2005, with a maximum capacity of 114,800 lb/hr, equipped with a baghouse dust collector as control, and exhausting to stack #14;
- (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; and
- (l) One (1) small lot bagging operation, installed in 2005, consisting of bagging unit #1 (EU100), bagging unit #2 (EU104), a seed pack fill (EU101), the CBT-100 treater (EU102) and aspirator (EU103), with a total maximum capacity of 198,800 lb/hour, equipped with a baghouse dust collector as control, and exhausting to stack #14.

(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, Rebagging #14	224	59.7
Debagger, EU34	28.0	38.2

The pounds per hour limitations for all stacks except #14 were 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

The pounds per hour limitation for stack #14 was calculated with the following equation:

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

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

D.1.2 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 Permit Revision to a Minor Source Operating Permit

Source Background and Description

Source Name:	Monsanto Company
Source Location:	15849 South US Highway 231, Remington, Indiana 47977
County:	Jasper
SIC Code:	0723
Operation Permit No.:	MSOP 073-20867-00035
Operation Permit Issuance Date:	August 3, 2005
Significant Permit Revision No.:	SPR 073-21252-00035
Permit Reviewer:	Patrick Brennan/MES

The Office of Air Quality (OAQ) has reviewed a permit revision application from the Monsanto Company relating to the construction and operation of the following emission units and pollution control devices:

- (h) One (1) treating/packaging machinery, identified as #12, installed in 1994, and modified in 2005, with a capacity of 134,400 lb/hr, equipped with a baghouse dust collector as control, and exhausting to stack #14;
- (i) One (1) rebagging unit, identified as #13, installed in 1992, and modified in 2005, with a maximum capacity of 114,800 lb/hr, equipped with a baghouse dust collector as control, and exhausting to stack #14;
- (l) One (1) small lot bagging operation, installed in 2005, consisting of bagging unit #1 (EU100), bagging unit #2 (EU104), a seed pack fill (EU101), the CBT-100 treater (EU102) and aspirator (EU103), with a total maximum capacity of 198,800 lb/hour, equipped with a baghouse dust collector as control, and exhausting to stack #14.

History

On May 24, 2005, the Monsanto Company submitted an application to the OAQ requesting to add one (1) small lot bagging operation consisting of bagging units #1 and #2, a seed pack fill, a CBT-100 treater and an aspirator to their existing hybrid corn seed processing plant.

Emissions from the existing treating/packaging machinery, identified as #12, and the existing rebagging unit, identified as #13, will also be redirected to exhaust through the new baghouse dust collector #14. Emissions from these devices also include a capacity increase, which has been included in the PTE calculations.

In addition, on October 28, 2004, the applicant submitted an application to quantify existing VOC and HAPs emissions from the treating and packaging operation, identified as #12. This

application was originally assigned permit number MPR 073-19971-00035, but has now been incorporated into this approval.

Enforcement Issue

- (a) IDEM is aware that the chemicals in the treating and packing operation have been applied prior to receipt of the proper permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
#14	Grain Bagging	8.0	3.0	14,650	Ambient

Recommendation

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

Unless otherwise stated, information used in this review was derived from the applications and additional information submitted by the applicant on December 15, 2004, and February 16, 2005.

Applications for the purposes of this review were received on October 28, 2004 and May 24, 2005.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided on pages 1 and 2 of 2 Appendix A of this document.

Potential To Emit of Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source 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.”

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

Pollutant	Potential To Emit (tons/year)
PM	51.0
PM ₁₀	28.4
SO ₂	-
VOC	17.0
CO	-
NO _x	-

HAPs	Potential To Emit (tons/year)
Glycol Ethers	0.127
TOTAL	0.127

Justification for Revision

The MSOP is being revised through a MSOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-6.1-6(i) because potential emissions of PM and PM₁₀ exceed twenty-five (25) tons per year.

County Attainment Status

The source is located in Jasper County.

Pollutant	Status
PM _{2.5}	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Jasper County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration

(PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

- (b) Jasper County has been classified as unclassifiable or 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 PM₁₀ emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability for the source section.
- (c) Jasper County has been classified as attainment or unclassifiable in Indiana 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 - Entire Source section of this document.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 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.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	25.4
PM ₁₀	10.5
SO ₂	0.30
VOC	2.90
CO	44.2
NO _x	52.6

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories.
- (b) These emissions are based upon information submitted by the applicant in the renewal application for MSOP 073-20867-00035, issued on August 3, 2005.

Potential to Emit of Entire Source After Issuance

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

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Proposed Revision	51.0	28.4	-	17.0	-	-	0.127
Existing Emissions	25.4	10.5	0.30	2.90	44.2	52.6	1.0
Total Emissions for Modified Source	76.4	38.9	0.30	19.9	44.2	52.6	1.13
MSOP Threshold Level	100	100	100	100	100	100	10/25

This revision to the existing MSOP will **not** change the status of the stationary source because the potential emissions from the entire source will still be less than the Part 70 major source thresholds.

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) is not included in this modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this proposed modification.

State Rule Applicability - Individual Facilities

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

This stationary source was constructed before August 1977. It does not belong to any of the 28 listed source categories. 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 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.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the bagging, packaging and treating operation (stack #14) shall not exceed 59.7 pounds per hour when operating at a process weight rate of 224 tons per hour. This limitation is based upon the following:

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

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

Based on the maximum hourly PM emissions before controls (13.7 pounds per hour), the bagging, packaging and treating operation (Stack 14) is in compliance with this rule. Operation of the baghouse is not required to show compliance with this rule.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

Because the grain treating operations use chemicals containing VOCs, 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) could be applicable. However, because potential VOC emissions from this process are less than 25.0 tons per year, this rule does not apply.

Compliance Requirements

Compliance monitoring is not required for the bagging and treating operation, because the emission limitations of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) can be met without the use of the control device.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

1. The equipment list in Section A.2 has been revised as follows:
 - (h) One (1) treating/packaging machinery, identified as #12, installed in 1994, **and modified in 2005**, with a capacity of 33,000 **134,400** 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;~~ **equipped with a baghouse dust collector as control, and exhausting to stack #14;**
 - (i) One (1) rebagging unit, identified as #13, installed in 1992, **and modified in 2005**, with a maximum capacity of 33,000 **114,800** lb/hr, ~~and equipped with one cyclone, identified as~~

#13A; equipped with a baghouse dust collector as control, and exhausting to stack #14;

- (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; **and**
- (l) **One (1) small lot bagging operation, installed in 2005, consisting of bagging unit #1 (EU100), bagging unit #2 (EU104), a seed pack fill (EU101), the CBT-100 treater (EU102) and aspirator (EU103), with a total maximum capacity of 198,800 lb/hour, equipped with a baghouse dust collector as control, and exhausting to stack #14.**

2. The Emissions Unit Description in Section D.1 has been revised as follows:

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, **and modified in 2005**, with a capacity of ~~33,000~~ **134,400** 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;~~ **equipped with a baghouse dust collector as control, and exhausting to stack #14;**
- (i) One (1) rebagging unit, identified as #13, installed in 1992, **and modified in 2005**, with a maximum capacity of ~~33,000~~ **114,800** lb/hr, ~~and equipped with one cyclone, identified as #13A;~~ **equipped with a baghouse dust collector as control, and exhausting to stack #14;**
- (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; **and**
- (l) **One (1) small lot bagging operation, installed in 2005, consisting of bagging unit #1 (EU100), bagging unit #2 (EU104), a seed pack fill (EU101), the CBT-100 treater (EU102) and aspirator (EU103), with a total maximum capacity of 198,800 lb/hour, equipped with a baghouse dust collector as control, and exhausting to stack #14.**

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

3. Condition D.1.1 has been revised as follows:

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
Treating/Packaging, Bagging #14	224	59.7
Debagger, EU34	28.0	38.2

The pounds per hour limitations was for all stacks except #14 were 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

The pounds per hour limitation for stack #14 was calculated with the following equation:

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

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

Conclusion

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision No. 073-21252-00035.

**Appendix A: Emissions Calculations
VOC Emissions
From Seed Coating Operations**

**Company Name: Monsanto Company
Address City IN Zip: 15849 South US Highway 231, Remington, Indiana 47977
Permit Number: 073-21252
Plt ID: 073-00035
Reviewer: Patrick Brennan/MES
Application Date: May 24, 2005**

Material	Density (Lb/Gal)	Weight % Volatile	Pounds VOC per gallon of coating	Gal of Mat. (gal/ton of seed)	Maximum (tons seed/year)	Potential VOC pounds per year	Potential VOC tons per year
Apron XL LS	9.3	68.0%	6.32	0.00656	17,500	726.00	0.36
Poncho - Medium	10.6	17.0%	1.80	0.35313	13,125	8344.09	4.17
Poncho High (overtreat)	10.6	17.0%	1.80	1.96870	2,500	8860.63	4.43
Precise - Medium	10.5	28.0%	2.94	0.31250	13,125	12058.59	6.03
Precise High (overtreat)	10.5	28.0%	2.94	0.46870	2,500	3444.95	1.72
Maxim XL	9.2	6.0%	0.55	0.02625	17,500	253.58	0.13
Red Colorant	9.9	1.8%	0.18	0.03906	10,000	69.60	0.03
Green Colorant	11.0	1.8%	0.20	0.04688	10,000	92.82	0.05
Blue Colorant	9.9	1.8%	0.18	0.07813	5,000	69.61	0.03
Seed Gloss	10.1	0.0%	0.00	0.00000	5000	0.00	0.00

33,919.86 16.96

METHODOLOGY

Potential VOC, Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/ton) * Maximum Annual Amount of Grain Coated (tons/yr)

Material	Density (Lb/Gal)	Gal of Mat. (gal/ton of seed)	Maximum (tons seed/ year)	Weight % Glycol Ethers	Glycol Ether Emissions (tons/year)
Apron XL LS	9.3	0.00656	17,500	0.0%	0.000
Poncho - Medium	10.6	0.35313	13,125	0.0%	0.000
Poncho High (overtreat)	10.6	1.96870	2,500	0.0%	0.000
Precise - Medium	10.5	0.31250	13,125	0.0%	0.000
Precise High (overtreat)	10.5	0.46870	2,500	0.0%	0.000
Maxim XL	9.2	0.02625	17,500	6.0%	0.127
Red Colorant	9.9	0.03906	10,000	0.0%	0.000
Green Colorant	11.0	0.04688	10,000	0.0%	0.000
Blue Colorant	9.9	0.07813	5,000	0.0%	0.000
Seed Gloss	10.1	0.00000	5,000	0.0%	0.000

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Coating (gal/ton) * Maximum Amount of Grain Coated(tons/year) * Weight % HAP * 1 ton/2000 lbs