



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: March 1, 2006
RE: Cargill AgHorizons- Linden Grain Elevator / 107-21971-00009
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 1/10/05



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NEW SOURCE REVIEW AND FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Cargill AgHorizons – Linden Grain Elevator
173 West County Road 1100 North
Linden, Indiana 47955**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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 2-8 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. **This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.**

Operation Permit No.: F107-21971-00009	
Original signed by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: March 1, 2006 Expiration Date: March 1, 2011



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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 A.3, and A.4 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 2-8-3(b)]

The Permittee owns and operates a stationary grain elevator for corn or soybeans.

Authorized individual:	Farm Services Group Leader
Source Address:	173 West County Road 1100 North, Linden, Indiana 47955
Mailing Address:	173 West County Road 1100 North, Linden, Indiana 47955
General Source Phone:	(765) 513-6224
SIC Code:	5153
County Location:	Montgomery County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

The following two (2) companies will be located at the same location (173 West County Road 1100 North, Linden, Indiana 47955):

- (a) Cargill AgHorizons – Linden Grain Elevator (Plant ID #107-00009), an existing grain elevator (SIC 5153), which started operation in 1972.
- (b) ASA Linden, LLC (Plant ID #107-00061), a new ethanol production plant (SIC 2869). All the grain received at the ethanol plant will be from Cargill AgHorizons - Linden Grain Elevator.

Since these two (2) plants will be located on the same property and will have a supporting relationship, IDEM, OAQ has determined that these two (2) plants should be considered one (1) source as defined by 326 IAC 2-7-1(22). Separate FESOPs will be issued to Plant #107-00009 and #107-00061 solely for administrative purposes. This permit covers the Cargill AgHorizons grain elevator plant (#107-00009).

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) grain receiving operation, identified as EU101, constructed in 1972 and modified in 2006, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:
 - (1) One (1) truck dump pit, with a maximum capacity of 840 tons of grain per hour.
 - (2) One (1) railcar dump pit, with a maximum capacity of 840 tons of grain per hour.

Under NSPS, Subpart DD, the grain receiving operation EU101 is considered a grain loading station. Mineral oil is applied to the corn which will be processed in the dryer EU100 and stored in the uncontrolled storage tanks EU109.

- (b) One (1) grain leg handling system, identified as EU102, constructed in 1972 and modified in 2006, controlled by baghouse BH2, with emissions exhausted through Stack EP120, and consisting of the following:
- (1) Two (2) enclosed transfer legs associated with the grain dump pits, identified as Leg 1 and Leg 2, each with a maximum throughput rate of 840 tons of grain per hour.
 - (2) Two (2) enclosed transfer legs associated with the grain dryer, identified as Leg 2 and Leg 3, each with a maximum throughput rate of 140 tons of grain per hour.

Under NSPS, Subpart DD, the grain leg handling system EU102 is considered a grain handling operation.

- (c) One (1) enclosed conveyor system, identified as EU103, constructed in 1972 and modified in 2006, controlled by baghouse BH2, with emissions exhausted through Stack EP120, and consisting of the following:
- (1) Four (4) enclosed conveyors, identified as EC1 through EC4, each with a maximum throughput rate of 840 tons of grain per hour.
 - (2) Five (5) enclosed conveyors which transfers grain to ASA Linden, LLC, identified as EC5 through EC9, with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the enclosed conveyor system EU103 is considered a grain handling operation.

- (d) One (1) drag conveyor system, identified as EU104, constructed in 1972 and modified in 2006, controlled by baghouse BH2, with emissions exhausted through Stack EP120, and consisting of three (3) enclosed drag conveyors (identified as D1 through D3), each with a maximum throughput rate of 140 tons of grain per hour. Under NSPS, Subpart DD, the drag conveyor system EU104 is considered a grain handling operation.
- (e) Five (5) enclosed storage tank conveyor system, identified as SC1 through SC5, constructed in 1972 and modified in 2006, each with a maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.
- (f) Seven (7) headhouse storage bins, identified as EU105, constructed in 1972, with a total storage capacity of 175,625 bushels, and with a total maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.
- (g) Eight (8) annex storage bins, identified as EU106, constructed in 1972, with a total storage capacity of 557,800 bushels and with a total maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.
- (h) One (1) grain scalper, identified as EU107, constructed in 1972 and modified in 2006, with a maximum throughput rate of 420 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.

- (i) One (1) natural gas fired column grain dryer, identified as EU100, constructed in 1982, with a maximum heat input capacity of 32.8 MMBtu/hr and a maximum throughput rate of 79 tons of grain per hour. Mineral oil is applied to the corn processed in this unit when it is received.

- (j) Four (4) metal storage tanks, identified as EU109, constructed in 1972, with a total storage capacity of 2.3 million bushels and a maximum total throughput rate of 560 tons of grain per hour. Mineral oil is applied to the corn processed in this unit when it is received.
- (k) Three (3) storage tank conveyors, identified as EU110, constructed in 1972, each with a maximum throughput rate of 560 tons of grain per hour. Mineral oil is applied to the corn processed in this unit when it is received.
- (l) One (1) grain loadout operation, identified as EU108, constructed in 1972 and modified in 2006, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:
 - (1) One (1) railcar loadout operation, with a maximum throughput rate of 1,120 tons of grain per hour.
 - (2) One (1) truck loadout operation, with a maximum throughput rate of 1,120 tons of grain per hour.

Under NSPS, Subpart DD, the grain loadout operation EU108 is considered a grain unloading station.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (c) Paved roads and parking lots with public access. [326 IAC 6-4]
- (d) Other emission units, not regulated by a NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:

One (1) outdoor grain storage pile, identified as EU111, with a total maximum throughput rate of 42,000 tons/yr. [326 IAC 6-4]

A.5 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.6 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][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, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report 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) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may be required to determine the compliance status of the source.

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(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) 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 PMPs do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

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

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) 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.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis which document all such changes and emissions trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) 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.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.3 and A.4.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][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

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (PSD) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.6 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.7 Stack Height [326 IAC 1-7]

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Testing Requirements [326 IAC 2-8-4(3)]

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If

required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

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(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

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

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “authorized individual” as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) 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.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be 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.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS – Grain Receiving, Handling, and Loadout Operations

Facility Description [326 IAC 2-8-4(10)] :

- (a) One (1) grain receiving operation, identified as EU101, constructed in 1972 and modified in 2006, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:

- (1) One (1) truck dump pit, with a maximum capacity of 840 tons of grain per hour.
- (2) One (1) railcar dump pit, with a maximum capacity of 840 tons of grain per hour.

Under NSPS, Subpart DD, the grain receiving operation EU101 is considered a grain loading station. Mineral oil is applied to the corn which will be processed in the dryer EU100 and stored in the uncontrolled storage tanks EU109.

- (b) One (1) grain leg handling system, identified as EU102, constructed in 1972 and modified in 2006, controlled by baghouse BH2, with emissions exhausted through Stack EP120, and consisting of the following:

- (1) Two (2) enclosed transfer legs associated with the grain dump pits, identified as Leg 1 and Leg 2, each with a maximum throughput rate of 840 tons of grain per hour.
- (2) Two (2) enclosed transfer legs associated with the grain dryer, identified as Leg 2 and Leg 3, each with a maximum throughput rate of 140 tons of grain per hour.

Under NSPS, Subpart DD, the grain leg handling system EU102 is considered a grain handling operation.

- (c) One (1) enclosed conveyor system, identified as EU103, constructed in 1972 and modified in 2006, controlled by baghouse BH2, with emissions exhausted through Stack EP120, and consisting of the following:

- (1) Four (4) enclosed conveyors, identified as EC1 through EC4, each with a maximum throughput rate of 840 tons of grain per hour.
- (2) Five (5) enclosed conveyors which transfers grain to ASA Linden, LLC, identified as EC5 through EC9, with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the enclosed conveyor system EU103 is considered a grain handling operation.

- (d) One (1) drag conveyor system, identified as EU104, constructed in 1972 and modified in 2006, controlled by baghouse BH2, with emissions exhausted through Stack EP120, and consisting of three (3) enclosed drag conveyors (identified as D1 through D3), each with a maximum throughput rate of 140 tons of grain per hour. Under NSPS, Subpart DD, the drag conveyor system EU104 is considered a grain handling operation.

- (e) Five (5) enclosed storage tank conveyor system, identified as SC1 through SC5, constructed in 1972 and modified in 2006, each with a maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.

- (f) Seven (7) headhouse storage bins, identified as EU105, constructed in 1972, with a total storage capacity of 175,625 bushels, and with a total maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.

- (g) Eight (8) annex storage bins, identified as EU106, constructed in 1972, with a total storage

SECTION D.1 FACILITY OPERATION CONDITIONS – Grain Receiving, Handling, and Loadout Operations

Facility Description [326 IAC 2-8-4(10)] :

capacity of 557,800 bushels and with a total maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.

- (h) One (1) grain scalper, identified as EU107, constructed in 1972 and modified in 2006, with a maximum throughput rate of 420 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.
- (i) One (1) natural gas fired column grain dryer, identified as EU100, constructed in 1982, with a maximum heat input capacity of 32.8 MMBtu/hr and a maximum throughput rate of 79 tons of grain per hour. Mineral oil is applied to the corn processed in this unit when it is received.
- (j) Four (4) metal storage tanks, identified as EU109, constructed in 1972, with a total storage capacity of 2.3 million bushels and a maximum total throughput rate of 560 tons of grain per hour. Mineral oil is applied to the corn processed in this unit when it is received.
- (k) Three (3) storage tank conveyors, identified as EU110, constructed in 1972, each with a maximum throughput rate of 560 tons of grain per hour. Mineral oil is applied to the corn processed in this unit when it is received.
- (l) One (1) grain loadout operation, identified as EU108, constructed in 1972 and modified in 2006, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:
 - (1) One (1) railcar loadout operation, with a maximum throughput rate of 1,120 tons of grain per hour.
 - (2) One (1) truck loadout operation, with a maximum throughput rate of 1,120 tons of grain per hour.

Under NSPS, Subpart DD, the grain loadout operation EU108 is considered a grain unloading station.

Insignificant Activities:

- (c) Paved roads and parking lots with public access. [326 IAC 6-4]
- (d) Other emission units, not regulated by a NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:

One (1) outdoor grain storage pile, identified as EU111, with a total maximum throughput rate of 42,000 tons/yr. [326 IAC 6-4]

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP and PSD Minor Limitations [326 IAC 2-2] [326 IAC 2-8-4]

- (a) The PM and PM₁₀ emissions from baghouses BH1 and BH2, which are used to control

the emissions from the grain receiving (EU101), handling (EU102 - EU107), and loadout (EU108) operations shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	Control Device	PM/PM10 Emission Limit (lbs/hr)
EU101	Grain Receiving	Baghouse BH1	0.54
EU108	Grain Loadout		
EU102- EU104	Grain Handling	Baghouse BH2	0.73
EU105, EU106	Grain Storage		
EU107	Scalper		

(b) The Permittee shall comply with the following throughput rate limits:

Unit ID	Unit Description	Throughput Limits (tons per twelve (12) consecutive month period)
EU101	Grain Receiving	1,330,000 of corn and soybean
EU101	Grain Receiving	42,000 of soybean
EU108	Grain Loadout	70,000 of corn and soybean
EU109	Grain Storage Tanks	252,000 of corn and soybean
EU110	Storage Tank Conveyors	252,000 of corn and soybean
EU100	Grain Dryer	252,000 of corn and soybean

(c) The Permittee shall comply with the following emission limitations for PM and PM10 emissions:

Unit ID	Unit Description	PM Emission Limit (lbs/ton)	PM10 Emission Limit (lbs/ton)
EU109	Grain Storage Tanks	0.025	0.0063
EU110	Storage Tank Conveyors	0.061	0.0340
EU100	Grain Dryer	0.083	0.0550

(d) The amount of natural gas combusted in the grain dryer (EU100) shall not exceed 80 million cubic feet (MMCF) per twelve (12) consecutive month period with compliance determined at the end of each month.

(e) NOx emissions from the grain dryer (EU100) shall not exceed 100 pounds per million cubic foot (lbs/MMCF).

(f) CO emissions from the grain dryer (EU100) shall not exceed 84 pounds per million cubic foot (lbs/MMCF).

(g) The Permittee shall apply mineral oil to the corn that will be processed in the dryer EU100 or stored in the uncontrolled storage tanks EU109.

(h) The Permittee shall use periodic sweeping to control PM and PM10 emissions from the paved roads. The sweeping shall be applied in a manner and at a frequency sufficient to ensure compliance with 326 IAC 2-2.

Combined with the PM/PM10, NOx, and CO emissions from other emission units and the PM/PM10 emissions from ASA Linden, LLC (Plant ID #107-00061), the PM/PM10, NOx, and CO emissions from the entire source are limited to less than 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-2 (PSD) are not applicable.

D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following operations shall not exceed the pound per hour limits listed in the table below:

Unit ID	Unit Description	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
EU101	Each Dump Pit	840	75.4
EU102	Grain Leg Handling	840	75.4
EU103	Enclosed Conveyor System	840	75.4
EU104	Drag Conveyor System	840	75.4
EU105	Each Headhouse Storage Bin	840	75.4
EU106	Each Annex Storage Bin	840	75.4
EU107	Grain Scalper	420	66.9
EU100	Grain Dryer	79	48.9
EU109	Each Metal Storage Tank	560	70.3
EU110	Each Storage Tank Conveyor	560	70.3
EU108	Each Grain Loadout Station	1,120	79.1

The pounds per hour limitations were calculated using the following equation:

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:

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

Pursuant to 326 IAC 6-3-2(e)(3), when the process weight exceeds 200 tons per hour, the maximum allowable emission may exceed the emission limits shown in the table above, provided the concentration of particulate matter in the gas discharged to the atmosphere is less than 0.10 pounds per 1,000 pounds of gases.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.4 Particulate Control

- (a) In order to comply with Conditions D.1.1(a) and D.1.2, each of the following emission units shall be controlled by the associated baghouse, as listed in the table below, when these units are in operation:

Unit ID	Unit Description	Baghouse ID
EU101	Each Dump Pit	BH1
EU102	Grain Leg Handling	BH2
EU103	Enclosed Conveyor System	BH2
EU104	Drag Conveyor System	BH2
EU105	Each Headhouse Storage Bin	BH2
EU106	Each Annex Storage Bin	BH2
EU107	Grain Scalper	BH2
EU108	Each Grain Loadout Station	BH1

- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1(a) and D.1.2, the Permittee shall perform PM and PM10 testing for baghouses BH1 and BH2 and the grain dryer (EU100) within 60 days after achieving the maximum capacity, but not later than 180 days after initial startup, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once

every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM-10 includes filterable and condensable PM-10.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the baghouse stack exhausts (stacks EP110 and EP120) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the grain receiving operation (EU101), the grain handling operations (EU102 through EU107, and conveyors SC1 through SC5) and the grain loadout operation (EU108), at least once per day when these units are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.8 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1(b), the Permittee shall maintain monthly records of the following:
 - (1) The amount of corn received in the grain receiving operation (EU101);
 - (2) The amount of soybean received in the grain receiving operation (EU101);
 - (3) The amount of grain shipped out in the grain loadout operation (EU108);
 - (4) The amount of grain stored in the grain storage tanks (EU109);
 - (5) The amount of grain handled in the storage tank conveyors (EU110); and
 - (6) The amount of grain input to the grain dryer (EU100).
- (b) To document compliance with Condition D.1.1(d), the Permittee shall maintain monthly records of natural gas usage in the grain dryer (EU100).
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts.
- (d) To document compliance with Condition D.1.7, the Permittee shall maintain daily records of pressure drop for baghouses during normal operation.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(b) and D.1.1(d) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

New Source Performance Standards (NSPS) [326 IAC 12]

D.1.11 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

- (a) The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the grain receiving operation (EU101), the grain handling operation (EU102 through EU104, and conveyors SC1 through SC5), and the grain loadout operation (EU108) except when otherwise specified in 40 CFR 60, Subpart DD.
- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

D.1.12 New Source Performance Standards for Grain Elevators Requirements [40 CFR Part 60, Subpart DD] [326 IAC 12]

Pursuant to 40 CFR Part 60, Subpart DD, the Permittee shall comply with the provisions of New Source Performance Standards for Grain Elevators, which are incorporated by reference as 326 IAC 12, for the grain receiving operation (EU101), the grain handling operation (EU102 through EU104, and conveyors SC1 through SC5), and the grain loadout operation (EU108) as follows:

§ 60.300 Applicability and designation of affected facility.

(a) The provisions of this subpart apply to each affected facility at any grain terminal elevator or any grain storage elevator, except as provided under §60.304(b). The affected facilities are each truck unloading station, truck loading station, barge and ship unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations.

(b) Any facility under paragraph (a) of this section which commences construction, modification, or reconstruction after August 3, 1978, is subject to the requirements of this part.

§ 60.301 Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.

(a) Grain means corn, wheat, sorghum, rice, rye, oats, barley, and soybeans.

(b) Grain elevator means any plant or installation at which grain is unloaded, handled, cleaned, dried, stored, or loaded.

(c) Grain terminal elevator means any grain elevator which has a permanent storage capacity of more than 88,100 m³ (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots.

(d) Permanent storage capacity means grain storage capacity which is inside a building, bin, or silo.

(e) Railcar means railroad hopper car or boxcar.

(f) Grain storage elevator means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 35,200 m³ (ca. 1 million bushels).

(g) Process emission means the particulate matter which is collected by a capture system.

(h) Fugitive emission means the particulate matter which is not collected by a capture system and is released directly into the atmosphere from an affected facility at a grain elevator.

(i) Capture system means the equipment such as sheds, hoods, ducts, fans, dampers, etc. used to collect particulate matter generated by an affected facility at a grain elevator.

(j) Grain unloading station means that portion of a grain elevator where the grain is transferred from a truck, railcar, barge, or ship to a receiving hopper.

(k) Grain loading station means that portion of a grain elevator where the grain is transferred from the elevator to a truck, railcar, barge, or ship.

(l) Grain handling operations include bucket elevators or legs (excluding legs used to unload barges or ships), scale hoppers and surge bins (garners), turn heads, scalpers, cleaners, trippers, and the headhouse and other such structures.

(m) Column dryer means any equipment used to reduce the moisture content of grain in which the grain flows from the top to the bottom in one or more continuous packed columns between two perforated metal sheets.

(n) Rack dryer means any equipment used to reduce the moisture content of grain in which the grain flows from the top to the bottom in a cascading flow around rows of baffles (racks).

(o) Unloading leg means a device which includes a bucket-type elevator which is used to remove grain from a barge or ship.

§ 60.302 Standard for particulate matter.

(b) On and after the date on which the performance test required to be conducted by §60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:

(1) Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf).

(2) Exhibits greater than 0 percent opacity.

(c) On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from:

(1) Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.

(2) Any grain handling operation which exhibits greater than 0 percent opacity.

(3) Any truck loading station which exhibits greater than 10 percent opacity.

§ 60.303 Test methods and procedures.

(a) In conducting the performance tests required in §60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b). Acceptable alternative methods and procedures are given in paragraph (c) of this section.

(b) The owner or operator shall determine compliance with the particulate matter standards in §60.302 as follows:

(1) Method 5 shall be used to determine the particulate matter concentration and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 1.70 dscm (60 dscf). The probe and filter holder shall be operated without heaters.

(2) Method 2 shall be used to determine the ventilation volumetric flow rate.

(3) Method 9 and the procedures in §60.11 shall be used to determine opacity.

(c) The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:

(1) For Method 5, Method 17 may be used.

D.1.13 One Time Deadlines Relating to New Source Performance Standards for Grain Elevators [40 CFR 60, Subpart DD]

The Permittee shall comply with the following requirements by the dates listed:

Requirement	Rule Cite	Affected Facility	Deadline
Initial Performance Test	40 CFR 60.303 and 40 CFR 60.8	The grain receiving operation (EU101), the grain handling operation (EU102 through EU104, and conveyors SC1 through SC5), and the grain loadout operation (EU108)	Within 60 days after achieving the maximum production rate, but no later than 180 days after initial startup.
Notification of date of reconstruction	40 CFR 60.7(a)(1)	The grain receiving operation (EU101), the grain handling operation (EU102 through EU104, and conveyors SC1 through SC5), and the grain loadout operation (EU108)	No later than 30 days after reconstruction
Notification of date of actual startup	40 CFR 60.7(a)(3)	The grain receiving operation (EU101), the grain handling operation (EU102 through EU104, and conveyors SC1 through SC5), and the grain loadout operation (EU108)	Within 15 days of startup date
Notification of any physical or operational change to an existing facility not exempt under 40 CFR 60.14(e)	40 CFR 60.7(a)(4)	The grain receiving operation (EU101), the grain handling operation (EU102 through EU104, and conveyors SC1 through SC5), and the grain loadout operation (EU108)	Within 60 days or as soon as practicable before change is commenced

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Cargill AgHorizons – Linden Grain Elevator
Source Address: 173 West County Road 1100 North, Linden, Indiana 47955
Mailing Address: 173 West County Road 1100 North, Linden, Indiana 47955
FESOP No.: 107-21971-00009

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Cargill AgHorizons – Linden Grain Elevator
Source Address: 173 West County Road 1100 North, Linden, Indiana 47955
Mailing Address: 173 West County Road 1100 North, Linden, Indiana 47955
FESOP No.: 107-21971-00009

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Cargill AgHorizons – Linden Grain Elevator
 Source Address: 173 West County Road 1100 North, Linden, Indiana 47955
 Mailing Address: 173 West County Road 1100 North, Linden, Indiana 47955
 FESOP No.: 107-21971-00009
 Facility: Grain Receiving Operation (EU101)
 Parameter: Total Grain Received (including corn and soybean)
 Limit: Less than 1,330,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Cargill AgHorizons – Linden Grain Elevator
Source Address: 173 West County Road 1100 North, Linden, Indiana 47955
Mailing Address: 173 West County Road 1100 North, Linden, Indiana 47955
FESOP No.: 107-21971-00009
Facility: Grain Receiving Operation (EU101)
Parameter: Total Soybean Received
Limit: Less than 42,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Cargill AgHorizons – Linden Grain Elevator
Source Address: 173 West County Road 1100 North, Linden, Indiana 47955
Mailing Address: 173 West County Road 1100 North, Linden, Indiana 47955
FESOP No.: 107-21971-00009
Facility: Grain Dryer (EU100)
Parameter: Total Grain Processed
Limit: Less than 252,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Cargill AgHorizons – Linden Grain Elevator
 Source Address: 173 West County Road 1100 North, Linden, Indiana 47955
 Mailing Address: 173 West County Road 1100 North, Linden, Indiana 47955
 FESOP No.: 107-21971-00009
 Facility: Grain Dryer (EU100)
 Parameter: Natural Gas Usage
 Limit: Less than 80 MMCF per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Cargill AgHorizons – Linden Grain Elevator
 Source Address: 173 West County Road 1100 North, Linden, Indiana 47955
 Mailing Address: 173 West County Road 1100 North, Linden, Indiana 47955
 FESOP No.: 107-21971-00009
 Facility: Metal Storage Tanks (EU109)
 Parameter: Total Grain Conveyed
 Limit: Less than 252,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Cargill AgHorizons – Linden Grain Elevator
Source Address: 173 West County Road 1100 North, Linden, Indiana 47955
Mailing Address: 173 West County Road 1100 North, Linden, Indiana 47955
FESOP No.: 107-21971-00009
Facility: Storage Tank Conveyors (EU110)
Parameter: Total Grain Conveyed
Limit: Less than 252,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Cargill AgHorizons – Linden Grain Elevator
Source Address: 173 West County Road 1100 North, Linden, Indiana 47955
Mailing Address: 173 West County Road 1100 North, Linden, Indiana 47955
FESOP No.: 107-21971-00009
Facility: Grain Loadout Operation (EU108)
Parameter: Total Grain Shipped Out
Limit: Less than 70,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Cargill AgHorizons – Linden Grain Elevator
 Source Address: 173 West County Road 1100 North, Linden, Indiana 47955
 Mailing Address: 173 West County Road 1100 North, Linden, Indiana 47955
 FESOP No.: 107-21971-00009

Months: _____ to _____ Year: _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Review and a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name: Cargill AgHorizons – Linden Grain Elevator
Source Location: 173 West County Road 1100 North, Linden, Indiana 47955
County: Montgomery
SIC Code: 5153
Operation Permit No.: F107-21971-00009
Permit Reviewer: ERG/YC

The Office of Air Quality (OAQ) has reviewed a FESOP application from Cargill AgHorizons – Linden Grain Elevator relating to the modification and operation of a grain elevator for corn or soybeans.

Source Definition

The following two (2) companies will be located at the same location (173 West County Road 1100 North, Linden, Indiana 47955):

- (a) Cargill AgHorizons – Linden Grain Elevator (Plant ID #107-00009), an existing grain elevator (SIC 5153), which started operation in 1972.
- (b) ASA Linden, LLC (Plant ID #107-00061), a new ethanol production plant (SIC 2869). All the grain received at the ethanol plant will be from Cargill AgHorizons – Linden Grain Elevator.

Since these two (2) plants will be located on the same property and will have a supporting relationship, IDEM, OAQ has determined that these two (2) plants should be considered one (1) source as defined by 326 IAC 2-7-1(22). Separate FESOPs will be issued to Plant #107-00009 and #107-00061 solely for administrative purposes. This permit covers the Cargill AgHorizons grain elevator plant (#107-00009).

Permitted Emission Units and Pollution Control Equipment

There are no permitted emission units operating at this source.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at the ASA Linden plant (#107-00061) during this review process. The existing emission units at Cargill AgHorizons plant (#107-00009) were constructed in 1972. Therefore, no construction permit was required for the existing emission units at the Cargill AgHorizons plant when they were constructed.

New and Modified Emission Units and Pollution Control Equipment

Cargill AgHorizons plant (#107-00009) is an existing grain elevator which has a maximum throughput rate less than 11,200,000 bushels per year. In order to supply the raw material (corn) for the proposed ethanol production plant (ASA Linden, LLC, Plant ID #107-00061), Cargill

AgHorizons is requesting to increase the maximum capacity at this plant by modifying the existing grain receiving and handling processes and adding new grain storage bins.

The application includes information relating to the prior approval for the modification and operation of the following equipment pursuant to 326 IAC 2-8-4(11) located at the Cargill AgHorizons plant (#107-00009):

- (a) One (1) grain receiving operation, identified as EU101, constructed in 1972 and modified in 2006, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:

- (1) One (1) truck dump pit, with a maximum capacity of 840 tons of grain per hour.
- (2) One (1) railcar dump pit, with a maximum capacity of 840 tons of grain per hour.

Under NSPS, Subpart DD, the grain receiving operation EU101 is considered a grain loading station. Mineral oil is applied to the corn which will be processed in the dryer EU100 and stored in the uncontrolled storage tanks EU109.

- (b) One (1) grain leg handling system, identified as EU102, constructed in 1972 and modified in 2006, controlled by baghouse BH2, with emissions exhausted through Stack EP120, and consisting of the following:

- (1) Two (2) enclosed transfer legs associated with the grain dump pits, identified as Leg 1 and Leg 2, each with a maximum throughput rate of 840 tons of grain per hour.
- (2) Two (2) enclosed transfer legs associated with the grain dryer, identified as Leg 2 and Leg 3, each with a maximum throughput rate of 140 tons of grain per hour.

Under NSPS, Subpart DD, the grain leg handling system EU102 is considered a grain handling operation.

- (c) One (1) enclosed conveyor system, identified as EU103, constructed in 1972 and modified in 2006, controlled by baghouse BH2, with emissions exhausted through Stack EP120, and consisting of the following:

- (1) Four (4) enclosed conveyors, identified as EC1 through EC4, each with a maximum throughput rate of 840 tons of grain per hour.
- (2) Five (5) enclosed conveyors which transfers grain to ASA Linden, LLC, identified as EC5 through EC9, with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the enclosed conveyor system EU103 is considered a grain handling operation.

- (d) One (1) drag conveyor system, identified as EU104, constructed in 1972 and modified in 2006, controlled by baghouse BH2, with emissions exhausted through Stack EP120, and consisting of three (3) enclosed drag conveyors (identified as D1 through D3), each with a maximum throughput rate of 140 tons of grain per hour. Under NSPS, Subpart DD, the drag conveyor system EU104 is considered a grain handling operation.

- (e) Five (5) enclosed storage tank conveyor system, identified as SC1 through SC5, constructed in 1972 and modified in 2006, each with a maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.

- (f) Seven (7) headhouse storage bins, identified as EU105, constructed in 1972, with a total storage capacity of 175,625 bushels, and with a total maximum throughput rate of 840

tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.

- (g) Eight (8) annex storage bins, identified as EU106, constructed in 1972, with a total storage capacity of 557,800 bushels and with a total maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.
- (h) One (1) grain scalper, identified as EU107, constructed in 1972 and modified in 2006, with a maximum throughput rate of 420 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.
- (i) One (1) natural gas fired column grain dryer, identified as EU100, constructed in 1982, with a maximum heat input capacity of 32.8 MMBtu/hr and a maximum throughput rate of 79 tons of grain per hour. Mineral oil is applied to the corn processed in this unit when it is received.
- (j) Four (4) metal storage tanks, identified as EU109, constructed in 1972, with a total storage capacity of 2.3 million bushels and a maximum total throughput rate of 560 tons of grain per hour. Mineral oil is applied to the corn processed in this unit when it is received.
- (k) Three (3) storage tank conveyors, identified as EU110, constructed in 1972, each with a maximum throughput rate of 560 tons of grain per hour. Mineral oil is applied to the corn processed in this unit when it is received.
- (l) One (1) grain loadout operation, identified as EU108, constructed in 1972 and modified in 2006, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:
 - (1) One (1) railcar loadout operation, with a maximum throughput rate of 1,120 tons of grain per hour.
 - (2) One (1) truck loadout operation, with a maximum throughput rate of 1,120 tons of grain per hour.

Under NSPS, Subpart DD, the grain loadout operation EU108 is considered a grain unloading station.

[Note: New equipment located at the new ethanol production plant (ASA Linden, LLC.), which is part of this source, is listed in the draft FESOP #107-21453-00061]

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (c) Paved roads and parking lots with public access. [326 IAC 6-4]
- (d) Other emission units, not regulated by a NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single

HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:

One (1) outdoor grain storage pile, identified as EU111, with a total maximum throughput rate of 42,000 tons/yr. [326 IAC 6-4]

Existing Approvals

There are no previous air approvals issued to the existing grain elevator plant (#107-00009) or the new ethanol production plant (#107-00061).

Enforcement Issue

There are no enforcement actions pending for the existing grain elevator (Plant ID #107-00009).

According to the information received on December 9, 2005, the actual grain receiving rate at this existing grain elevator before modification has never exceeded 11,200,000 bushels per year and this plant was constructed in 1972. Pursuant to 326 IAC 2-11-3(b), this existing grain elevator has been operated under Permit-by-Rule for grain elevators.

Recommendation

The staff recommends to the Commissioner that the FESOP 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 administratively complete FESOP application for the purposes of this review was received on September 20, 2005. Additional information was received on November 8, 2005, December 9, 2005, and January 6, 2006.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 7).

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit for Plant #107-00009 (tons/yr)	Potential to Emit for Plant #107-00061* (tons/yr)	Potential to Emit for the Entire Source (tons/yr)
PM	Greater than 100	Greater than 100	Greater than 100
PM10	Greater than 100	Greater than 100	Greater than 100
SO ₂	0.09	67.1	67.2
VOC	0.79	Greater than 100	Greater than 100
CO	12.1	Greater than 100	Greater than 100
NO _x	14.4	Greater than 100	Greater than 100

HAPs	Potential to Emit for Plant #107-00009*	Potential to Emit for Plant #107-00061	Potential to Emit for the Entire Source

	(tons/yr)	(tons/yr)	(tons/yr)
Acetaldehyde	-	13.5	13.5
Acrolein	-	0.24	0.24
Formaldehyde	Negligible	1.75	1.75
Methanol	-	1.47	1.47
Hexane	Negligible	3.34	3.34
n-Hexane	-	4.02	4.02
Benzene	-	0.20	0.20
Other HAPs	Negligible	Negligible	Negligible
Total	Negligible	Greater than 25	Greater than 25

*Note: The PTE for Plant #107-00061 is from draft TSD for FESOP #107-21453-00061. This permit is currently being reviewed and has not yet been issued.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10, VOC, CO, and NOx are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (c) Fugitive Emissions
 Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD applicability.

Potential to Emit After Issuance

The source has applied for a FESOP. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP 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-10	SO ₂	VOC	CO	NO _x	HAPs
Grain Receiving, Handling, and Loadout	Less than 5.56	Less than 5.56	-	-	-	-	-
Fugitive Grain Receiving and Loadout	Less than 5.26	Less than 1.24	-	-	-	-	-
Uncontrolled Storage Tanks (EU109) and the Conveyors (EU110)	Less than 5.42	Less than 2.54	-	-	-	-	-
Grain Dryer (EU100)	Less than 5.23	Less than 3.47	Less than 0.02	Less than 0.22	Less than 3.36	Less than 4.00	Negligible
Paved Roads (Fugitive)	Less than 5.23	Less than 1.02	-	-	-	-	-
Storage Pile (Fugitive)	0.03	0.02	-	-	-	-	-
Total PTE of Plant #107-00009*	Less than 26.7	Less than 13.9	Less than 0.02	Less than 0.22	Less than 3.36	Less than 4.00	Negligible
Total PTE of Plant #107-00061*	Less than 70.4	Less than 64.0	Less than 67.1	Less than 93.5	Less than 96.4	Less than 95.1	Less than 8.33 for a single HAP and 15.7 for total HAPs
Total PTE of the Entire Source	Less than 97.1	Less than 77.9	Less than 67.1	Less than 93.7	Less than 99.8	Less than 99.1	Less than 8.33 for a single HAP and 15.7 for total HAPs
PSD/TV Major Thresholds	100	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

Note: "-" pollutant not emitted by the facility.

* The PTE for Plant #107-00061 is from the draft TSD for FESOP #107-21453-00061. This permit is currently being reviewed and has not yet been issued.

County Attainment Status

The source is located in Montgomery County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Attainment or Unclassifiable
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Montgomery 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 – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides 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 the ozone standards.

Montgomery County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) Montgomery 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.

Source Status

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

Pollutant	Potential to Emit for Plant #107-00009 (tons/yr)
PM	Less than 100
PM-10	Less than 100
SO ₂	Less than 100
VOC	Less than 100
CO	Less than 100
NO _x	Less than 100
A single HAP	Negligible
Combination HAPs	Negligible

- (a) This existing source, which includes the existing grain elevator plant #107-00009 and the new proposed ethanol production plant #107-00061, is not a PSD major stationary source because no regulated pollutant is emitted at a rate of 100 tons per year or greater and it is in one of the 28 listed source categories.
- (b) The potential to emit for the existing plant (Plant #107-00009) is estimated by the Permittee. There is no existing potential to emit for the new ethanol production plant #107-00061 since it has not yet been constructed.

Federal Rule Applicability

- (a) Cargill AgHorizons is an existing grain elevator which has a total grain storage capacity less than 2.5 million bushels and was constructed before August 3, 1978, the applicability date for the New Source Performance Standards for Grain Elevators (326 IAC 12, 40 CFR 60.300-304, Subpart DD). Therefore, the requirements of NSPS, Subpart DD were not applicable to the existing grain elevator.

The Permittee proposes to expand the operation at this existing grain elevator (Plant #107-00009) in 2006. The maximum grain storage capacity for Cargill AgHorizons will become greater than 2.5 million bushels. The grain received and processed will be transferred to the collocated ethanol production plant (ASA Linden, LLC) or shipped out to other customers. In order to accommodate this expansion, there will be physical changes to the existing grain receiving operation (EU101), the grain handling operation (EU102 through EU104, and conveyors SC1 through SC5), and the grain loadout operation (EU108). The Permittee stated that there will be no physical changes to the existing grain dryer (EU100) and storage tanks (EU105, EU106, and EU109). Therefore, the existing grain receiving operation (EU101), the grain handling operation (EU102 through EU104, and conveyors SC1 through SC5), and the grain loadout operation (EU108) are subject to the following provisions of 40 CFR 60, Subpart DD upon the start up of the modified emission units:

- 40 CFR 60.300
- 40 CFR 60.301
- 40 CFR 60.302(b)
- 40 CFR 60.302(c)(1)(2)(3)

40 CFR 60.303

Nonapplicable portions of the NSPS will not be included in the permit.

Note that the corn received at the collocated ethanol production plant - ASA Linden, LLC (Plant ID #107-00061) is dried corn and will only be used to produce ethanol (not for human consumption). In addition, the maximum grain storage capacity in ASA Linden, LLC is less than 2.5 million bushels per year. Therefore, the corn handling operation at ASA Linden, LLC is not considered a grain storage terminal or a grain terminal elevator, pursuant to 40 CFR 60.301(c) and (f). The requirements of this NSPS, Subpart DD are not applicable to the grain handling operations at ASA Linden, LLC.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 20, and 40 CFR Part 61 and 63) included in this permit.

State Rule Applicability – Entire Source

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

This source was constructed in 1972 and will be modified in 2006. Cargill AgHorizons is collocated with ASA Linden, LLC, which belongs to the chemical plant source category defined in 326 IAC 2-2-1(gg). The potential to emit PM, PM10, VOC, CO, and NOx from the entire source before control is greater than 100 tons/yr.

In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the source shall comply with the following for Cargill AgHorizons (Plant #107-00009):

- (a) The PM emissions from baghouses BH1 and BH2, which are used to control the emissions from the grain receiving (EU101), handling (EU102 - EU107), and loadout (EU108) operations shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	Control Device	PM Emission Limit (lbs/hr)
EU101	Grain Receiving	Baghouse BH1	0.54
EU108	Grain Loadout		
EU102- EU104	Grain Handling	Baghouse BH2	0.73
EU105, EU106	Grain Storage		
EU107	Scalper		

The use of baghouses BH1 and BH2 is necessary to ensure compliance with the PM limits above.

- (b) The Permittee shall comply with the following throughput rate limits:

Unit ID	Unit Description	Throughput Limits (tons per twelve (12) consecutive month period)
EU101	Grain Receiving	1,330,000 of corn and soybean
EU101	Grain Receiving	42,000 of soybean
EU108	Grain Loadout	70,000 of corn and soybean
EU109	Grain Storage Tanks	252,000 of corn and soybean
EU110	Storage Tank Conveyors	252,000 of corn and soybean
EU100	Grain Dryer	252,000 of corn and soybean

- (c) The Permittee shall comply with the following emission limitations for PM emissions:

Unit ID	Unit Description	PM Emission Limit (lbs/ton)
EU109	Grain Storage Tanks*	0.025
EU110	Storage Tank Conveyors*	0.061
EU100	Grain Dryer	0.083

*These are the emission factors in AP-42, Table 9.9.1-1.

- (d) The Permittee shall apply mineral oil to the corn that will be processed in the dryer EU100 or stored in the uncontrolled storage tanks EU109.
- (e) The Permittee shall use periodic sweeping to control PM emissions from the paved roads. The sweeping shall be applied in a manner and at a frequency sufficient to ensure compliance with 326 IAC 2-2.

Combined with the PM emissions from other PM emission units and the PM emissions from ASA Linden, LLC (Plant ID #107-00061), PM emissions from the entire source are limited to less than 100 tons/yr.

The source has also accepted limits on the PM10, VOC, CO, and NOx emissions from the entire source, which will limit emissions of these pollutants to less than 100 tons/yr (see the discussion of 326 IAC 2-8-4 below). Therefore, the requirements of 326 IAC 2-2 are not applicable.

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

This source was constructed in 1972 and will be modified in 2006. The source will accept FESOP limits on the HAP emissions from the entire source, such that the emissions from the source are limited to less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination of HAPs (see the discussion of 326 IAC 2-8-4 below). Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-8-4 (FESOP)

The potential to emit PM10, VOC, CO, and NOx before control of the entire source is greater than 100 tons/yr. In addition, the potential to emit HAP before control from this source is greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for total HAPs. Pursuant to 326 IAC 2-8-4 (FESOP), the source shall comply with the following for Cargill AgHorizons (Plant #107-00009):

- (a) The PM10 emissions from baghouses BH1 and BH2, which are used to control the emissions from the grain receiving (EU101), handling (EU102 - EU107), and loadout (EU108) operations shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	Control Device	PM10 Emission Limit (lbs/hr)
EU101	Grain Receiving	Baghouse BH1	0.54
EU108	Grain Loadout		
EU102- EU104	Grain Handling	Baghouse BH2	0.73
EU105, EU106	Grain Storage		
EU107	Scalper		

The use of baghouses BH1 and BH2 is necessary to ensure compliance with the PM10 limits above.

- (b) The Permittee shall comply with the following throughput rate limits:

Unit ID	Unit Description	Throughput Limits (tons per twelve (12) consecutive month period)
EU101	Grain Receiving	1,330,000 of corn and soybean
EU101	Grain Receiving	42,000 of soybean
EU108	Grain Loadout	70,000 of corn and soybean
EU109	Grain Storage Tanks	252,000 of corn and soybean
EU110	Storage Tank Conveyors	252,000 of corn and soybean
EU100	Grain Dryer	252,000 of corn and soybean

(c) The Permittee shall comply with the following emission limitations for PM10 emissions:

Unit ID	Unit Description	PM10 Emission Limit (lbs/ton)
EU109	Grain Storage Tanks*	0.0063
EU110	Storage Tank Conveyors*	0.0340
EU100	Grain Dryer	0.0550

*These are the emission factors in AP-42, Table 9.9.1-1.

- (d) The amount of natural gas combusted in the grain dryer (EU100) shall not exceed 80 million cubic feet (MMCF) per twelve (12) consecutive month period with compliance determined at the end of each month.
- (e) NOx emissions from the grain dryer (EU100) shall not exceed 100 pounds per million cubic foot (lbs/MMCF).
- (f) CO emissions from the grain dryer (EU100) shall not exceed 84 pounds per million cubic foot (lbs/MMCF).
- (g) The Permittee shall apply mineral oil to the corn that will be processed in the dryer EU100 or stored in the uncontrolled storage tanks EU109.
- (h) The Permittee shall use periodic sweeping to control PM10 emissions from the paved roads. The sweeping shall be applied in a manner and at a frequency sufficient to ensure compliance with 326 IAC 2-2.

Combined with the PM10, VOC, NOx, CO, and HAP emissions from other emission units and the PM10, VOC, NOx, CO, and HAP emissions from ASA Linden, LLC (Plant ID #107-00061), the emissions from the entire source are limited to less than 100 tons/yr for PM10, VOC, NOx, and CO, less than 10 tons/yr for a single HAP, and less than 25 tons/yr for total HAPs. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) are not applicable. These limits for PM10, VOC, NOx, CO and HAP, combined with the PM limits discussed previously, make the requirements of 326 IAC 2-2 not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Montgomery County and is not required to operate under a Part 70 permit. Therefore, the requirements of 326 IAC 2-6 are not applicable to this source.

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 for sources 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Individual Facilities

State Rule Applicability - Grain Receiving, Handling, and Loadout Operations

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

Pursuant to 326 IAC 6-3-2, particulate emissions from each of the following operations shall not exceed the pound per hour limits listed in the table below:

Unit ID	Unit Description	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
EU101	Each Dump Pit	840	75.4
EU102	Grain Leg Handling	840	75.4
EU103	Enclosed Conveyor System	840	75.4
EU104	Drag Conveyor System	840	75.4
EU105	Each Headhouse Storage Bin	840	75.4
EU106	Each Annex Storage Bin	840	75.4
EU107	Grain Scalper	420	66.9
EU100	Grain Dryer	79	48.9
EU109	Each Metal Storage Tank	560	70.3
EU110	Each Storage Tank Conveyor	560	70.3
EU108	Each Grain Loadout Station	1,120	79.1

The pounds per hour limitations were calculated using the following equation:

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:

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

Pursuant to 326 IAC 6-3-2(e)(3), when the process weight exceeds 200 tons per hour, the maximum allowable emission may exceed the emission limits shown in the table above, provided the concentration of particulate matter in the gas discharged to the atmosphere is less than 0.10 pounds per 1,000 pounds of gases.

As shown in the calculations in Appendix A, the potential to emit PM after control from the grain receiving operation (EU101), the grain handling operations (EU102 through EU107, EU109, and EU110), the grain dryer (EU100), the grain loadout operations (EU108) are less than the emission limits above. Therefore, these operations can comply with 326 IAC 6-3-2. The baghouses BH1 and BH2 for the grain receiving, handling, and loadout operations will be used to comply with the emission limits above.

State Rule Applicability – Paved Roads and Storage Pile (Insignificant Activities)

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

326 IAC 6-5 (Fugitive Particulate Emissions Limitations)

The potential fugitive particulate emissions, as defined in 326 IAC 6-5-2, from the paved roads or the storage pile at this source are less than 25 tons/yr. Therefore, the requirements of 326 IAC 6-5 are not applicable.

Testing Requirements

In order to demonstrate compliance with the FESOP, PSD minor limits, and 40 CFR 60, Subpart DD, the Permittee shall perform the following tests within 60 days after achieving the maximum capacity but not later than 180 days after modifying the existing grain elevator (#107-00009):

- (a) PM and PM10 tests for baghouses BH1 and BH2, which are used to control the particulate emissions from the grain unloading operation (EU101), the grain handling operations (EU102 through EU107), and the grain loadout operation (EU108).
- (b) PM and PM10 tests for the grain dryer (EU100).
- (c) Opacity tests for the baghouses BH1 and BH2.

These tests shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration.

Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The grain unloading operation (EU101), the grain handling operations (EU102 through EU107, and conveyors SC1 through SC5), and the grain loadout operation (EU108) have applicable compliance monitoring conditions as specified below. These units are controlled by baghouses BH1 and BH2.
 - (a) Visible emission notations of the baghouse stack exhausts (stacks EP110 and EP120) shall be performed once per day during normal daylight operations. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (b) The Permittee shall record the pressure drop across baghouses BH1 and BH2 used in conjunction with the grain unloading operation (EU101), the grain handling operations (EU102 through EU107, and SC1 through SC5), and the grain loadout operation (EU108), at least once per day. When for any one reading, the pressure drop across baghouses BH1 and BH2 is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in

accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

These monitoring conditions are necessary because baghouses BH1 and BH2 for the grain unloading operation (EU101), the grain handling operations (EU102 through EU107, and SC1 through SC5), and the grain loadout operation (EU108), must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-8 (FESOP), 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), and 40 CFR 60, Subpart DD.

Conclusion

The modification and operation of this grain elevator shall be subject to the conditions of FESOP 107-21971-00009.

Appendix A: Emission Calculations
PM and PM10 Emissions
From the Grain Receiving, Handling, and Loadout Operations

Company Name: Cargill AgHorizontes - Linden Grain Elevator
Address: 173 West County Road 1100 North, Linden, IN 47955
FESOP: 107-21971-00009
Reviewer: ERG/YC
Date: January 9, 2006

1. Potential to Emit PM/PM10 - Captured Emissions:

Baghouse ID	Process Description	Control Device	Outlet Grain Loading (gr/dscf)	Maximum Air Flow Rate (scfm)	PTE of PM/PM10 after Control (lbs/hr)	PTE of PM/PM10 after Control (tons/yr)	Control Efficiency (%)	PTE of PM/PM10 before Control (tons/yr)
BH1	Grain Receiving and Loadout	Baghouse	0.0025	25,000	0.54	2.35	99%	235
BH2	Grain Handling	Baghouse	0.0025	34,000	0.73	3.19	99%	319
Total						5.54		554

Assume all PM emissions equal PM10 emissions.

Methodology

PTE of PM/PM10 after Control (lbs/hr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr

PTE of PM/PM10 after Control (tons/yr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr x 8760 hr/yr x 1 ton/2000 lbs

PTE of PM/PM10 before Control (tons/yr) = PTE of PM/PM10 after Control (tons/yr) / (1-Control Efficiency)

2. Potential to Emit PM/PM10 - Fugitive Emissions:

Unit ID	Unit Description	Annual Throughput Limit (tons/yr)	Uncontrolled PM Emission Factor (lbs/ton)	Uncontrolled PM10 Emission Factor (lbs/ton)	Baghouse ID	Capture Efficiency (%)	PTE of PM after Control (tons/yr)	PTE of PM10 after Control (tons/yr)
EU101	Grain Receiving	1,330,000	0.035	0.0078	BH1	80%	4.66	1.04
EU108	Grain Loadout	70,000	0.086	0.0290	BH1	80%	0.60	0.20
EU102-EU104	Grain Handling	1,330,000	0.061	0.0340	BH2	100%	0.00	0.00
EU105, EU106	Grain Storage	1,078,000	0.025	0.0063	BH2	100%	0.00	0.00
EU107	Scalper	1,330,000	0.061	0.0340	BH2	100%	0.00	0.00
Total							5.26	1.24

Note: Emission factors are from AP-42, Chapter 9.9.1 - Grain Elevators, Table 9.9.1-1 (04/03). Assume all the grain is received and loadout by trucks, which is the worst case scenario.

Mineral oil is also applied to corn when it is received.

Methodology

Fugitive PM/PM10 (tons/yr) = Annual Throughput Limit (tons/yr) x Uncontrolled Emission Factor (lbs/ton) x (1-Capture Efficiency%) x 1 ton/2000 lbs

Appendix A: Emission Calculations
PM and PM10 Emissions
From the Grain Storage Operation (EU109) and Storage Tank Conveyors (EU110)

Company Name: Cargill AgHorizontes - Linden Grain Elevator
Address: 173 West County Road 1100 North, Linden, IN 47955
FESOP: 107-21971-00009
Reviewer: ERG/YC
Date: January 9, 2006

1. Hourly Potential to Emit PM/PM10:

Unit ID	Unit Description	Max. Throughput Rate (tons/hr)	Uncontrolled PM Emission Factor (lbs/ton)	Uncontrolled PM10 Emission Factor (lbs/ton)	PTE of PM without oil application (lbs/hr)	PTE of PM10 without oil application (lbs/hr)	Control Efficiency* (%)	PTE of PM with oil application (lbs/hr)	PTE of PM10 with oil application (lbs/hr)
EU109	Each Metal Grain Storage Tank	560	0.025	0.0063	14.0	3.53	60%	5.60	1.41
EU110	Each Storage Tank Conveyor	560	0.061	0.0340	34.2	19.0	60%	13.7	7.62

Note: Emission factors are from AP-42, Chapter 9.9.1 - Grain Elevators, Table 9.9.1-1 (03/03).

* Mineral oil is applied to the corn when it is received. The control efficiency for mineral oil is from AP-42, Section 9.9.1.2.1 (04/03).

Methodology

PTE of PM/PM10 without oil application (lbs/hr) = Max. Throughput Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton)

PTE of PM/PM10 with oil application (lbs/hr) = PTE of PM/PM10 without oil application (lbs/hr) x (1-Control Efficiency)

2. Annual Potential to Emit PM/PM10:

Unit ID	Unit Description	Annual Throughput Limit (tons/yr)	Uncontrolled PM Emission Factor (lbs/ton)	Uncontrolled PM10 Emission Factor (lbs/ton)	PTE of PM before Control (tons/yr)	PTE of PM10 before control (tons/yr)	Control Efficiency* (%)	PTE of PM after Control (tons/yr)	PTE of PM10 after Control (tons/yr)
EU109	Grain Storage Tanks - Corn	210,000	0.025	0.0063	2.63	0.66	60%	1.05	0.26
EU110	Storage Tank Conveyors -Corn	210,000	0.061	0.0340	6.41	3.57	60%	2.56	1.43
EU109	Grain Storage Tanks - Soybean	42,000	0.025	0.0063	0.53	0.13	0%	0.53	0.13
EU110	Storage Tank Conveyors - Soybeans	42,000	0.061	0.0340	1.28	0.71	0%	1.28	0.71
Total					10.8	5.08		5.42	2.54

Note: Emission factors are from AP-42, Chapter 9.9.1 - Grain Elevators, Table 9.9.1-1 (04/03).

* Mineral oil is applied to the corn when it is received. The control efficiency for mineral oil is from AP-42, Section 9.9.1.2.1 (04/03).

Methodology

PTE of PM/PM10 before Control (tons/yr) = Annual Throughput Limit (tons/yr) x Uncontrolled Emission Factor (lbs/ton) x 1 ton/2000 lbs

PTE of PM/PM10 after Control (tons/yr) = PTE of PM/PM10 before Control (tons/yr) x (1-Control Efficiency)

**Appendix A: Emission Calculations
PM and PM10 Emissions
From the Grain Dryer EU100**

**Company Name: Cargill AgHorizontes - Linden Grain Elevator
Address: 173 West County Road 1100 North, Linden, IN 47955
FESOP: 107-21971-00009
Reviewer: ERG/YC
Date: January 9, 2006**

1. Unlimited PTE

Unit Description	Max. Throughput Rate (tons/hr)	Uncontrolled PM Emission Factor* (lbs/ton)	PTE of PM (lbs/hr)	PTE of PM (tons/yr)	Uncontrolled PM10 Emission Factor* (lbs/ton)	PTE of PM10 (lbs/hr)	PTE of PM10 (tons/yr)
Grain Dryer	79	0.083	6.56	28.7	0.0550	4.35	19.0
Total				28.7			19.0

*Emission factors are provided by the dryer manufacturer and will be verified by stack tests. These emission factors are lower than the emission factors in AP-42, Table 9.9.1-1.

Methodology

PTE of before Control (lbs/hr/unit) = Max. Throughput Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton)

PTE before Control (tons/yr) = Max. Throughput Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hr/yr x 1 ton/2000 lbs x Number of Units

2. Limited PTE

Unit Description	Annual Throughput Limit (tons/yr)	PM Emission Factor* (lbs/ton)	PM10 Emission Factor* (lbs/ton)	Control Efficiency**	Limited PTE of PM (tons/yr)	Limited PTE of PM10 (tons/yr)
Grain Dryer - soybean	42,000	0.083	0.0550	0%	1.74	1.16
Grain Dryer - corn**	210,000	0.083	0.0550	60%	3.49	2.31
Total***	252,000				5.23	3.47

* Emission factors are provided by the dryer manufacturer and will be verified by stack tests. These emission factors are lower than the emission factors in AP-42, Table 9.9.1-1.

** Mineral oil is sprayed to the corn when it is received. The control efficiency for mineral oil is from AP-42, Section 9.9.1.2.1 (04/03).

Methodology

Limited PTE of PM/PM10 (tons/yr) = Annual Throughput Limit (tons/yr) x Emission Factor (lbs/ton) x 1 ton/2000 lbs x (1-Control Efficiency)

**Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From the Grain Dryer EU100**

**Company Name: Cargill AgHorizontes - Linden Grain Elevator
Address: 173 West County Road 1100 North, Linden, IN 47955
FESOP: 107-21971-00009
Reviewer: ERG/YC
Date: January 9, 2006**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMSCF/yr

Fuel Usage Limit
MMSCF/yr

32.8

287.3

80.0

	Pollutant					
Emission Factor in lb/MMSCF	PM	PM10	SO ₂	*NO _x	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
Unlimited Potential to Emit in tons/yr	**	**	0.09	14.4	0.79	12.1
Limited Potential to Emit in tons/yr	**	**	0.02	4.00	0.22	3.36

*Emission factors for NO_x: Uncontrolled = 100 lb/MMSCF.

** PM/PM10 emissions from the dryers are included in the emission calculations in page 3 of this appendix.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
(AP-42 Supplement D 3/98)

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMSCF = 1,000,000 Standard Cubic Feet of Gas

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

Unlimited Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF) x 1 ton/2000 lbs

Limited Potential to Emit (tons/yr) = Fuel Usage Limit (MMSCF/yr) x Emission Factor (lb/MMSCF) x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Fugitive Emissions From Paved Roads**

**Company Name: Cargill AgHorizontes - Linden Grain Elevator
Address: 173 West County Road 1100 North, Linden, IN 47955
FESOP: 107-21971-00009
Reviewer: ERG/YC
Date: January 9, 2006**

1. Emission Factors: AP-42

According to AP-42, Chapter 13.2.1 - Paved Roads (12/03), the PM/PM10 emission factors for paved roads can be estimated from the following equation:

$$E = (k \times (sL/2)^a \times (w/3)^b - C) \times (1 - p/(4 \times 365))$$

where:

E = emission factor (lb/vehicle mile traveled)	
sL = road surface silt loading (g/m ²) =	0.6 (g/m ²) (AP-42, Table 13.2.1-3)
w = mean vehicle weight (tons) =	25.0 tons
k = empirical constant =	0.082 for PM and 0.016 for PM10
a = empirical constant =	0.65
b = empirical constant =	1.5
C = emission factor for exhaust, brake and tire wear	0.00047 for PM and PM10
p = number of days per year with 0.01 inches precipitation	120

$$\text{PM Emission Factor} = (0.082 \times (7.4/2)^{0.65} \times (25/3)^{1.5} - 0.00047) \times (1 - 120/1460) = \mathbf{0.83 \text{ lbs/mile}}$$

$$\text{PM10 Emission Factor} = (0.016 \times (7.4/2)^{0.65} \times (25/3)^{1.5} - 0.00047) \times (1 - 120/1460) = \mathbf{0.16 \text{ lbs/mile}}$$

2. Potential to Emit (PTE) of PM/PM10 Before Control from Paved Roads:

Vehicle Type	*Ave Weight of Vehicles (tons)	*Trip Number (trips/yr)	* Round Trip Distance (mile/trip)	Vehicle Mile Traveled (VMT) (miles/yr)	Traffic Component (%)	Component Vehicle Weight (tons)	PTE of PM before Control (tons/yr)	PTE of PM10 before Control (tons/yr)
Grain Receiving	25	53,200	0.45	23,940	94.7%	23.7	9.90	1.93
Grain Shipping	25	2,950	0.45	1,328	5.25%	1.31	0.55	0.11
Total				25,268	100%	25.0	10.5	2.04

* This information is provided by the source.

Methodology

Vehicle Miles Traveled (miles/yr) = Trip Number (trips/yr) x Round-Trip Distance (mile/trip)

Traffic Component (%) = VMT / Total VMT

Component Vehicle Weight = Ave. Weight of Vehicles (ton) x Traffic Component (%)

PTE of PM/PM10 before Control (tons/yr) = VMT (miles/yr) x PM/PM10 Emission Factors x 1 ton/2000 lbs

3. Potential to Emit (PTE) of PM/PM10 after Control from Paved Roads:

The source proposed to use periodic sweeping to control the fugitive dust emissions.

The control efficiency from sweeping is assumed to be 50%.

$$\text{PTE of PM after Control} = 10.5 \text{ tons/yr} \times (1-50\%) = \mathbf{5.23 \text{ tons/yr}}$$

$$\text{PTE of PM10 after Control} = 2.04 \text{ tons/yr} \times (1-50\%) = \mathbf{1.02 \text{ tons/yr}}$$

**Appendix A: Emission Calculations
Potential PM and PM10 Emissions
From the Grain Storage Pile**

**Company Name: Cargill AgHorizontes - Linden Grain Elevator
Address: 173 West County Road 1100 North, Linden, IN 47955
FESOP: 107-21971-00009
Reviewer: ERG/YC
Date: January 9, 2006**

1. Emission Factors:

According to AP42, Chapter 13.2.4 - Aggregate Handling and Storage Piles (AP-42, 01/95), the PM/PM10 emission factors for aggregate handling process can be estimated from the following equation:

$$E_f = \frac{k \times 0.0032 \times (U/5)^{1.3}}{(M/2)^{1.4}}$$

where:

E _f = Emission Factor (lbs/ton)	
k = Particle size multipliers =	0.74 for PM and 0.35 for PM10
U = Mean wind speed (mph) =	10 mph (provided by the source)
M = Moisture content (%) =	5 % (provided by the source)

Therefore,

PM Emission Factor =	0.0016 lbs/ton process
PM10 Emission Factor =	0.0008 lbs/ton process

2. Potential to Emit PM/PM10 before Control:

Max. Throughput Rate: 42,000 tons/yr

PTE of PM (tons/yr) = 420,000 ton/yr x 0.0016 lbs/ton x 1 tons/2000 lbs = 0.03 tons/yr

PTE of PM10 (tons/yr) = 420,000 ton/hr x 0.0008 lbs/ton x 1 tons/2000 lbs = 0.02 tons/yr

**Appendix A: Emission Calculations
PTE Summary**

**Company Name: Cargill AgHorizontes - Linden Grain Elevator
Address: 173 West County Road 1100 North, Linden, IN 47955
FESOP: 107-21971-00009
Reviewer: ERG/YC
Date: January 9, 2006**

Limited Potential To Emit After Control

Emission Units	PM	PM10	SO₂	*NO_x	VOC	CO	Total HAPs
Grain Receiving and Loadout (Captured)	5.54	5.54	-	-	-	-	-
Grain Receiving and Loadout (Fugitive)	5.26	1.24	-	-	-	-	-
Grain Storage (EU109 and EU110)	5.42	2.54	-	-	-	-	-
Grain Dryer (EU100)	5.23	3.47	0.02	4.00	0.22	3.36	Negligible
Paved Roads (Fugitive)	5.23	1.02	-	-	-	-	-
Storage Pile (Fugitive)	0.03	0.02	-	-	-	-	-
Total	26.7	13.8	0.02	4.00	0.22	3.36	Negligible