



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: April 19, 2006
RE: Monsanto Global Seed Company / 159-22713-00010
FROM: Nisha Sizemore
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 03/23/06



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Ms. Marlene Graham
Monsanto Global Seed Company
908 North Independence
Windfall, Indiana 46076

April 19, 2006

Re: 159-22713-00010
First Minor Permit Revision to
MSOP 159-15902-00010

Dear Ms. Graham:

Monsanto Global Seed Company was issued a Minor Source Operating Permit on February 28, 2003 for a stationary soybean seed processing plant. A letter requesting changes to this permit was received on February 27, 2006. Pursuant to the provisions of 326 IAC 2-6.1-6, a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of replacing the existing spirals with three (3) color sorters, adding one new baghouse (9A), replacing the existing belt conveyor with a pneumatic conveying system, and changing the control options for the existing emissions units. In addition, the general conditions related to this revision in Section C of the permit have been updated to the most current language.

The following construction conditions are applicable to the proposed project:

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Pursuant to IC 13-15-5-3, this approval to construct becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this permit revision which includes this letter, the attached operating conditions applicable to these emission units, and revised permit pages to the front of the original permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 386-1024 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed By:
Nysa James, Chief
Permit Review Section 1
Permits Branch

Attachments

ERG/YC

cc: File – Tipton County
Tipton County Health Department
Air Compliance Section Inspector – Marc Goldman
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner



Mitchell E. Daniels, Jr.
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Thomas W. Easterly
 Commissioner

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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Monsanto Global Seed Company
 908 North Independence
 Windfall, Indiana 46076**

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

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

Operation Permit No.: MSOP 159-15902-00010	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 28, 2003 Expiration Date: February 28, 2008

1st Notice Only Change No.: 159-21175-00010, issued May 24, 2005

First Minor Permit Revision No.: 159-22713-00010	Pages Affected: 4, 5, 8, 9, 10, 11, 14 - 17
Issued by: Original Signed By: Nysa James, Chief Permit Review Section 1 Permits Branch	Issuance Date: April 19, 2006 Expiration Date: February 28, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a soybean seed processing plant.

Authorized Individual:	Site Manager
Source Address:	908 North Independence, Windfall, Indiana 46076
Mailing Address:	908 North Independence, Windfall, Indiana 46076
General Source Phone:	765-945-7121
SIC Code:	0723
County Location:	Tipton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) One (1) soybean receiving pit (identified as 1E), constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using baghouse 9A as control and exhausting to stack 9A and inside the building.
- (b) Two (2) cleaners (identified as 3E), constructed prior to 1978, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using a baghouse as control, and exhausting to stack 3A.
- (c) Two (2) color sorters, identified as 9EA and 9EB, constructed in 2006, each with a maximum capacity of 15 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (d) One (1) color sorter, identified as 9EC, constructed in 2006, with a maximum capacity of 7.5 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (e) Three (3) gravity tables (identified as 5E, 6E and 7E), constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones as control, and exhausting to stack 5A, 6A and 7A.
- (f) Two (2) aspirators (identified as 2E), constructed prior to 1978, with a maximum combined aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (g) One (1) baghouse (identified as baghouse 8A), constructed September 20, 2000, venting otherwise fugitive emissions from storage bins, scales, conveyors, mini bulk bagging system, bulk bagging system, and bag filters located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.

- (h) Four (4) storage bins, each with a maximum grain storage capacity of one thousand (1,000) bushels, controlled by one (1) baghouse with a control efficiency of 99% and a maximum gas flow rate of five hundred (500) actual cubic feet per minute (acfm).

SECTION B GENERAL CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

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

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

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

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

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

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

B.5 Modification to Permit [326 IAC 2]

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

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

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within thirty (30) days after issuance of this permit, including the following information on each emissions unit:
- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's 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 PMP whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]

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, EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

C.5 Stack Height [326 IAC 1-7]

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

C.6 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 an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **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 that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements

C.7 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40

CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source 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.8 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

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11]

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

C.12 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (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.

Record Keeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required data, reports and support information 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 kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) soybean receiving pit (identified as 1E), constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using baghouse 9A as control and exhausting to stack 9A and inside the building.
- (b) Two (2) cleaners (identified as 3E), constructed prior to 1978, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using a baghouse as control, and exhausting to stack 3A.
- (c) Two (2) color sorters, identified as 9EA and 9EB, constructed in 2006, each with a maximum capacity of 15 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (d) One (1) color sorter, identified as 9EC, constructed in 2006, with a maximum capacity of 7.5 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (e) Three (3) gravity tables (identified as 5E, 6E and 7E), constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones as control, and exhausting to stack 5A, 6A and 7A.
- (f) Two (2) aspirators (identified as 2E), constructed prior to 1978, with a maximum combined aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (g) One (1) baghouse (identified as baghouse 8A), constructed September 20, 2000, venting otherwise fugitive emissions from storage bins, scales, conveyors, mini bulk bagging system, bulk bagging system, and bag filters located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.
- (h) Four (4) storage bins, each with a maximum grain storage capacity of one thousand (1,000) bushels, controlled by one (1) baghouse with a control efficiency of 99% and a maximum gas flow rate of five hundred (500) actual cubic feet per minute (acfm).

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

Emission Limitations and Standards

D.1.1 PSD Minor Limit [326 IAC 2-2]

The particulate matter emissions from the soybean processing plant shall not exceed the following pound per hour limitations:

Facility	PM Limit (lbs/hr)
Soybean receiving pit	0.32
Internal handling	0.18
Cleaners	0.23
Gravity tables	2.25
Soybean packaging	0.42
Aspirators	0.90 (total)
Color sorters	0.023 (total)

Compliance with these limits makes 326 IAC 2-2 not applicable.

D.1.2 Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3, particulate emissions from the soybean receiving pit shall not exceed 50.23 pounds per hour when operating at a process weight of 90 tons per hour. The pounds per hour limitation was calculated using the following equation:

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

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

D.1.3 Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3, particulate emissions from the soybean cleaners, color sorters, gravity tables, packaging, aspirators, and storage bins shall not exceed the pound per hour limit provided in the table below.

Facility	Process Weight (tons/hr)	Particulate Emission Limit (lbs/hr)
Cleaners (2) (per cleaner)	15	25.16
Each of Color Sorters 9EA and 9EB	15	25.2
Color Sorter 9EC	7.5	15.8
Gravity Tables (3) (per gravity table)	10	19.18
Packaging	30	40.04
Aspirators	30	40.04
Storage Bins	30	40.04

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

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

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

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.5 Particulate Control

- (a) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the cyclones and baghouses for particulate control shall be in operation and control emissions from the soybean seed processing facilities at all times these facilities are in operation.
- (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.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(2)]

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the soybean seed processing facilities stack exhausts from stacks 3A, 5A, 6A and 7A shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the stack exhaust from stack 9A shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) 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

- (a) The Permittee shall record the pressure drop across baghouse 3A used in conjunction with the soybean cleaners, at least once per shift when the soybean cleaners are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 6.5 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.
- (b) The Permittee shall record the pressure drop across baghouse 9A used in conjunction with the soybean seed processing facilities, at least once per day when the soybean seed processing facilities are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 6.5 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 Baghouse Inspections

An inspection shall be performed each calendar quarter of baghouse 3A controlling the soybean cleaners. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.9 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the process. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.10 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 emission units. 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.

D.1.11 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.12 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the soybean seed stack exhausts.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the pressure drop for baghouses 3A and 9A during normal operation.
- (c) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.8 and D.1.9 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Monsanto Global Seed Company
Address:	908 North Independence
City:	Windfall, Indiana 46076
Phone #:	765-945-7121
MSOP #:	159-15902-00010

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

I hereby certify that Monsanto Global Seed Company is in compliance with the requirements of MSOP 159-15902-00010.
not in compliance with the requirements of MSOP 159-15902-00010.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Monsanto Global Seed Company
Source Location:	908 North Independence, Windfall, Indiana 46076
County:	Tipton
SIC Code:	0723
Operation Permit No.:	159-15902-00010
Operation Permit Issuance Date:	February 28, 2003
Minor Permit Revision No.:	159-22713-00010
Permit Reviewer:	ERG/YC

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

History

Monsanto Global Seed Company is an existing soybean seed processing plant operating under MSOP #159-15902-00010, issued on February 28, 2003. In the application received on February 27, 2006, the Permittee requested the following changes:

- (a) Replacing the existing eight (8) spirals with three (3) color sorters. The color sorters will be controlled by a new baghouse (identified as 9A), which vents to both stack 9A (3,000 cfm) and inside the building (33,500 cfm).
- (b) Replacing the existing belt conveyor with a pneumatic conveying system which will be controlled by baghouse 9A.
- (c) Using the new baghouse (9A) to control the existing soybean receiving pit (1E), the aspirators (2E), and the cleaners (3E). The existing control devices associated with these units will be removed.
- (d) The unit description for the aspirator should be changed from "one (1) aspirator with a capacity of 30 tons/hr" to "two (2) aspirators with a combined capacity of 30 tons/hr". This change will not increase the potential to emit from the entire source since the total capacity of the aspirators remains the same. Therefore, the unit description in Condition A.2 and D.1 has been revised.

Existing Approvals

The source was issued a MSOP No. 159-15902-00010, on February 28, 2003. The source has since received the following:

First Notice-only Change No. 159-21175-00010, issued on May 24, 2005.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An application for the purposes of this review was received on February 27, 2006. Additional information was received on March 17, 2006 and March 20, 2006.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (page 1).

Potential To Emit of the Revision

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

Pollutant	Potential To Emit (tons/year)
PM	10.0
PM10	5.58
SO ₂	--
VOC	--
CO	--
NO _x	--

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Justification for Permit Revision

This revision is being performed as a Minor Permit Revision because this modification has potential to emit PM/PM10 greater than 5 tons/yr and less than 25 tons/yr, pursuant to 326 IAC 2-6.1-6(g)(4)(A).

Potential to Emit of the Source after Revision

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

Process/Emission Unit	Potential To Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Color Sorters*	Less than 0.10	Less than 0.06	-	-	-	-	-
PTE of the Existing Units, Excluding the Spirals**	Less than 14.9	Less than 2.89	-	-	-	-	-
Total PTE of the Entire Source after Revision	Less than 15.0	Less than 2.95	-	-	-	-	-
TV Major Thresholds	NA	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

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

* These units are controlled by baghouse 9A, which is required to meet the limits to avoid the requirements of 326 IAC 2-2 (PSD).

** This is equal to the total PTE of the entire source minus the PTE of the spirals. The PTE information is from the TSD for MSOP #159-15902-00010, issued on February 28, 2003.

After making the changes proposed in this revision, the potential to emit of the criteria pollutants from the entire source is still less than the Title V major source thresholds. Therefore, the requirements of 326 IAC 2-7 are not applicable to this source.

County Attainment Status

The source is located Tipton County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment or Unclassifiable
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Tipton County has been classified as unclassifiable or attainment for PM2.5. 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 PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Tipton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Significant Deterioration (PSD) and 326 IAC 2-2.
- (c) Tipton 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.
- (d) Fugitive Emissions
 Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this revision.
- (b) This soybean seed processing plant does not have a grain terminal elevator with a permanent storage capacity greater than 1.0 million bushels. This revision will not increase the grain storage capacity of this source. Therefore, the requirements of the New Source Performance Standards for Grain Elevators (326 IAC 12, 40 CFR 60.300-304, Subpart DD) are not included in this revision.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 20; and 40 CFR Parts 61 and 63) included in this revision.

State Rule Applicability – Soybean Color Sorters

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

This existing source is not in 1 of 28 source categories defined in 326 IAC 2-2-1(gg) and has the potential to emit PM before control greater than 250 tons per year. The Permittee has been using baghouses and cyclones to control the PM emissions from the entire source to less than 250 tons/yr. The potential to emit PM₁₀, VOC, SO₂, VOC, NO_x, and CO before control of this source is less than 100 tons/yr. Therefore, this existing source is a PSD minor source.

The potential to emit of PM and criteria pollutants of this revision is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable. In order to remain a PSD minor source, the total PM emission from the color sorters are limited to 0.023 lbs/hr. Combined with the PM emissions from other existing units, the PM emissions from the entire source are limited to less than 250 tons/yr. Therefore, this source will remain a PSD minor source after this revision.

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

There are no HAP emissions from the color sorters. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

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

Pursuant to 326 IAC 6-3-2, particulate emissions from each of the color sorters (9EA, 9EB, and 9EC) shall not exceed the pound per hour limits listed in the table below:

Unit Description	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Each of the Color Sorters 9EA and 9EB	15	25.2
Color Sorter 9EC	7.5	15.8

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

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

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

According to the emission calculations in Appendix A, the potential to emit PM from the color sorters before control is less than the emission limits above. Therefore, the new color sorters are capable of complying with the requirements of 326 IAC 6-3-2 without the use of control device (baghouse 9A).

Compliance Requirements

Permits issued under 326 IAC 2-6 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 2-6. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

1. Baghouse 9A, which is used to control the emissions from the soybean receiving pit (1E), the cleaners (3E), the color sorters (9EA, 9EB, and 9EC), and the aspirators (2E), has applicable compliance monitoring conditions as specified below. This unit is equipped with an integral baghouse.
 - (a) Visible emission notations of the baghouse stack exhaust (stack 9A) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee or contractor is a person who has worked or trained 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. Section C - Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
 - (b) The Permittee shall record the pressure drop across baghouse 9A used in conjunction with the soybean receiving pit (1E), the cleaners (3E), the color sorters (9EA, 9EB, and 9EC), and the aspirators (2E) once per day. When for any one reading, the pressure drop across baghouse is outside the normal range of 0.5 and 6.5 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 baghouse 9A equipped with the soybean receiving pit (1E), the cleaners (3E), the color sorters (9EA, 9EB, and 9EC), and the aspirators (2E) must operate properly to ensure compliance with 326 IAC 2-2 (PSD).

Proposed Changes

The following changes have been made to the permit based on the changes requested by the Permittee and the additional changes made by IDEM, OAQ. Language with a line through it has been deleted, and bold language has been added. The Table of Contents has been updated as necessary.

1. The mailing address for IDEM, OAQ has been changed as follows:

100 North Senate Avenue, ~~P.O. Box 6015~~
Indianapolis, Indiana 46204~~6-6015~~

This change has been made throughout the whole permit.

2. The source status in Condition A.1 has been revised as follows to indicate that this source is operating under a minor source operating permit.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a soybean seed processing plant.

Authorized Individual:	Site Manager
Source Address:	908 North Independence, Windfall, Indiana 46076
Mailing Address:	908 North Independence, Windfall, Indiana 46076
General Source Phone:	765-945-7121
SIC Code:	0723
County Location:	Tipton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

3. The section's name that collects operating fees has changed. This has been updated in Condition B.11 Annual Fee Payment. The current name is the Technical Support and Modeling Section Billing, Licensing, and Training Section.

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

-
- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, ~~IM & Billing Section~~ **Billing, Licensing, and Training**), to determine the appropriate permit fee.
4. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised as follows to remove (a) which contained these requirements.
- C.1 **Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour** ~~[40 CFR 52 Subpart P] [326 IAC 6-3-2]~~
-
- (a) ~~Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate 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.
5. IDEM realizes that the specifications of Condition C.11 - Pressure Gauge and Other Instrument Specifications, can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instrument is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the language in Condition C.11 has been revised.
- C.11 ~~Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]~~
-
- (a) ~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed~~ **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 normal maximum reading for the normal range shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.**
- (b) The Permittee may request ~~that~~ the IDEM, OAQ approve the use of ~~a pressure gauge or other~~ **an** instrument that does not meet the above specifications provided the Permittee can demonstrate ~~that~~ an alternative ~~pressure gauge or other~~ instrument specification will adequately ensure compliance with permit conditions requiring the measurement of ~~pressure drop or other~~ **the** parameters.
6. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan (Condition C.12). The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. Therefore, the condition for "Compliance Response Plan" has been replaced by the condition for "Response to Excursions or Exceedances".
- C.12 ~~Compliance Response Plan - Preparation and Implementation~~ **Response to Excursions or Exceedances**
-
- (a) ~~The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this~~

~~permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:~~

- ~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~
 - ~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~
- ~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~
- ~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~
 - ~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~
 - ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.~~
 - ~~(4) Failure to take reasonable response steps shall constitute a violation of the permit.~~
- ~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~
- ~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
 - ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~
 - ~~(3) An automatic measurement was taken when the process was not operating.~~
 - ~~(4) The process has already returned or is returning to operating within Anormal@ parameters and no response steps are required.~~
- ~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B Deviations from Permit Requirements and Conditions.~~
- ~~(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

- ~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- (a) **Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (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.**

7. Condition A.2 and Section D.1 have been revised as follows to reflect the proposed changes. The equation listed in Condition D.1.2 for the requirements in 326 IAC 6-3-2 was incorrect and has been revised. The conditions that refer to "Section C - Compliance Response Plan" have been revised to reflect the new condition title (Response to Excursions or Exceedances). In addition, failure to take response steps is considered a deviation from the permit, not a violation.

Upon further review, IDEM determined to revise Condition D.1.10 to address those processes that operate in batch mode. The condition required an emission unit to be shut down immediately in case of baghouse failure. However, IDEM is aware that there can be safety issues related to shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has

revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

In addition, Condition D.1.5 - Particulate Control, has been revised to require the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) One (1) soybean receiving pit (identified as 1E), constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using a cyclone baghouse 9A as control and exhausting to stack 4A 9A and inside the building.
- ...
- (c) Two (2) color sorters, identified as 9EA and 9EB, constructed in 2006, each with a maximum capacity of 15 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (d) One (1) color sorter, identified as 9EC, constructed in 2006, with a maximum capacity of 7.5 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- ~~(e) Eight (8) spirals, (identified as 4E), with a combined maximum sorting capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using hanging bags as control, and exhausting inside the building.~~
- (de) Three (3) gravity tables (identified as 5E, 6E and 7E), constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones as control, and exhausting to stack 5A, 6A and 7A.
- (ef) ~~One (1)~~ Two (2) aspirators (identified as 2E), constructed prior to 1978, with a maximum combined aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using a cyclone baghouse 9A as control, and exhausting to stack 2A 9A and inside the building.
- (fg) One (1) baghouse (identified as baghouse 8A), constructed September 20, 2000, venting otherwise fugitive emissions from storage bins, scales, conveyors, mini bulk bagging system, bulk bagging system, and bag filters located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.
- (gh) Four (4) storage bins, each with a maximum grain storage capacity of one thousand (1,000) bushels, controlled by one (1) baghouse with a control efficiency of 99% and a maximum gas flow rate of five hundred (500) actual cubic feet per minute (acfm).

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) soybean receiving pit (identified as 1E), constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using ~~a cyclone~~ **baghouse 9A** as control and exhausting to stack ~~4A~~ **9A and inside the building.**
- ...
- (c) **Two (2) color sorters, identified as 9EA and 9EB, constructed in 2006, each with a maximum capacity of 15 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.**
- (d) **One (1) color sorter, identified as 9EC, constructed in 2006, with a maximum capacity of 7.5 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.**
- ~~(e) Eight (8) spirals, (identified as 4E), with a combined maximum sorting capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using hanging bags as control, and exhausting inside the building.~~
- ~~(e)~~ Three (3) gravity tables (identified as 5E, 6E and 7E), constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones as control, and exhausting to stack 5A, 6A and 7A.
- ~~(e)~~ **Two (2) aspirators (identified as 2E), constructed prior to 1978, with a maximum combined aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using ~~a cyclone~~ baghouse 9A as control, and exhausting to stack ~~2A~~ 9A and inside the building.**
- ~~(f)~~ One (1) baghouse (identified as baghouse 8A), constructed September 20, 2000, venting otherwise fugitive emissions from storage bins, scales, conveyors, mini bulk bagging system, bulk bagging system, and bag filters located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.
- ~~(g)~~ Four (4) storage bins, each with a maximum grain storage capacity of one thousand (1,000) bushels, controlled by one (1) baghouse with a control efficiency of 99% and a maximum gas flow rate of five hundred (500) actual cubic feet per minute (acfm).

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

D.1.1 PSD Minor Limit [326 IAC 2-2] ~~[40 CFR 52.24]~~

The particulate matter emissions from the soybean processing plant shall not exceed the following pound per hour limitations:

Facility	PM Limit (lbs/hr)
Soybean receiving pit	0.32
Internal handling	0.18
Cleaners	0.23
Gravity tables	2.25
Spirals	0.23
Soybean packaging	0.42
Aspirators	0.90 (total)
Color sorters	0.023 (total)

Compliance with these limits makes 326 IAC 2-2 and ~~40 CFR 52.24~~ not applicable.

D.1.2 Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3, particulate emissions from the soybean receiving pit shall not exceed 50.23 pounds per hour when operating at a process weight of 90 tons per hour. The pounds per hour limitation was calculated using the following equation:

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

$$E = 4.10 \cdot 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3, particulate emissions from the soybean cleaners, ~~spirals~~ **color sorters**, gravity tables, packaging, aspirators, and storage bins shall not exceed the pound per hour limit provided in the table below.

Facility	Process Weight (tons/hr)	Particulate Emission Limit (lbs/hr)
Cleaners (2) (per cleaner)	15	25.16
Spirals (8) (per spiral)	3.75	9.94
Each of Color Sorters 9EA and 9EB	15	25.2
Color Sorter 9EC	7.5	15.8
Gravity Tables (3) (per gravity table)	10	19.18
Packaging	30	40.04
Aspirators	30	40.04
Storage Bins	30	40.04

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

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

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

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

D.1.5 Particulate Control

- (a)** Pursuant to F159-11180-00010, issued January 25, 2000, and in order to comply with Conditions D.1.1, ~~and~~ D.1.2, **and D.1.3**, the cyclones and baghouses for particulate control shall be in operation and control emissions from the soybean seed processing facilities at all times these facilities are in operation.
- (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.1.6 Visible Emissions Notations

- (a) Visible emission notations of the soybean seed processing facilities stack exhausts **from stacks (1A, 2A, 3A, 5A, 6A and 7A)** shall be performed once per shift during normal daylight operations ~~when exhausting to the atmosphere~~. A trained employee shall record whether emissions are normal or abnormal.
- (b) **Visible emission notations of the stack exhaust from stack 9A shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.**
- (bc) 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.
- (ed) 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.
- (de) 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.
- (ef) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emissions is 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 - ~~Compliance Response Plan - Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** shall be considered a ~~violation of~~ **deviation from** this permit.

D.1.7 Parametric Monitoring

- (a) The Permittee shall record the ~~total static~~ pressure drop across ~~the~~ baghouses **3A** used in conjunction with the soybean ~~seed processing facilities~~, at least once per shift when the soybean ~~seed processing facilities~~ are in operation, ~~when venting to the atmosphere~~. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 6.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with ~~accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **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 - Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) **The Permittee shall record the pressure drop across baghouse 9A used in conjunction with the soybean seed processing facilities, at least once per day when the soybean seed processing facilities are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 6.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with 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 - ~~Pressure Gauge and Other 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 Baghouse Inspections

An inspection shall be performed each calendar quarter of ~~all bags~~ **baghouse 3A** controlling the soybean **cleaners** seed processing facilities ~~when venting to the atmosphere~~. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.9 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the process ~~when venting to the atmosphere~~. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.10 Broken or Failed Bag Detection

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

- ~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.~~
- ~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~
- (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 emission units. 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.

D.1.11 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C - ~~Compliance Response Plan—Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.

D.1.12 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the soybean seed stack exhausts ~~when venting to the atmosphere.~~
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records ~~once per shift~~ of the ~~total static~~ pressure drop **for baghouses 3A and 9A** during normal operation ~~when venting to the atmosphere.~~

...

Conclusion

The operation of this soybean seed processing plant shall be subject to the conditions of the attached proposed MSOP Minor Permit Revision No. 159-22713-00010.

**Appendix A: Emission Calculations
PM and PM10 Emissions
From the Three (3) Soybean Color Sorters (9E)**

**Company Name: Monsanto Global Seed Company
Address: 908 North Independence, Windfall, IN 46076
MPR: 159-22713-00010
Reviewer: ERG/YC
Date: April 11, 2006**

1. Potential to Emit PM/PM10 Before Control:

Unit ID	Unit Description	Max. Throughput Rate (tons/hr/unit)	Number of Units	Uncontrolled PM Emission Factor (lbs/ton)	PTE of PM before Control (lbs/hr/unit)	PTE of PM before Control (tons/yr)	Uncontrolled PM10 Emission Factor (lbs/ton)	PTE of PM10 before Control (lbs/hr/unit)	PTE of PM10 before Control (tons/yr)
9EA and B	Color Sorters	15	2	0.061	0.92	8.02	0.034	0.51	4.47
9EC	Color Sorter	7.5	1	0.061	0.46	2.00	0.034	0.26	1.12
Total					1.37	10.0			5.58

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

Methodology

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

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

2. Potential to Emit PM/PM10 After Control:

Unit ID	Unit Description	Number of Units	Control Efficiency* (%)	PTE of PM after Control (lbs/hr/unit)	PTE of PM after Control (tons/yr)	PTE of PM10 after Control (lbs/hr/unit)	PTE of PM10 after Control (tons/yr)
9EA and B	Color Sorters	2	99%	9.15E-03	0.08	5.10E-03	0.04
9EC	Color Sorter	1	99%	4.58E-03	0.02	2.55E-03	0.01
Total				0.023	0.10		0.06

* These units are controlled by baghouse 9A.

Methodology

PTE after Control (lbs/hr/unit) = PTE before Control (lbs/hr/unit) x (1 - Control Efficiency)

PTE after Control (tons/yr) = PTE before Control (lbs/hr/unit) x 8760 hr/yr x 1 ton/2000 lbs x (1 - Control Efficiency) x Number of Units