



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
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TO: Interested Parties / Applicant  
DATE: June 29, 2007  
RE: Cargill AgHorizons / 129-22803-00001  
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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# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT OFFICE OF AIR QUALITY

**Cargill AgHorizons  
1000 Old SR 69 S (Uniontown Road)  
Mount Vernon, Indiana 47620**

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

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F129-22803-00001	
Original signed by: Nisha Sizemore, Chief Permit Branch Office of Air Quality	Issuance Date: June 29, 2007  Expiration Date: June 29, 2012

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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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary wholesale grain processing operation.

Source Address:	1000 Old SR 69 S (Uniontown Road), Mount Vernon, Indiana 47620
Mailing Address:	1000 Old SR 69 S (Uniontown Road), Mount Vernon, Indiana 47620
General Source Phone Number:	812-838-4300
SIC Code:	5153
County Location:	Posey
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD or Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

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

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

- (a) Three (3) grain elevator systems, identified as emission units ID 1, 2, and 3, with a maximum throughput of forty (40) million bushels of grain per year, using a Dacron baghouse each for control, exhausting through two (2) Cyclone Dust Collectors and the exhaust from dust collectors is collected at a dust collection tank. The three systems are:
  - (1) System 1, using a Dacron baghouse, identified as DS-1, for particulate control, exhausting through two (2) Cyclone Dust Collectors, which exhausts back into the grain handling process, consisting of the following emission units:
    - (A) One (1) truck receiving area, identified as Truck Dump #1, with a maximum hourly capacity of 17,500 bushels per hour;
    - (B) One (1) truck receiving area identified as Truck Dump #2, with a maximum hourly capacity of 17,500 bushels per hour;
    - (C) Grain handling from Bin 12 Upper to Grain Scale, with a maximum hourly capacity of 40,000 bushels per hour; and
    - (D) Grain handling from Grain Scale to Hawk Belt, with a maximum hourly capacity of 40,000 bushels per hour;
  - (2) System 2, using a Dacron baghouse, identified as DS-2 for particulate control, exhausting through two (2) Cyclone Dust Collectors, which exhausts back into the grain handling process, consisting of the following emission units:
    - (A) Grain handling from Drag Conveyor DC-1 to Leg 1, with a maximum hourly capacity of 20,000 bushels per hour;

- (B) Grain handling from Drag Conveyor DC-2 to Leg 2 with a maximum hourly capacity of 20,000 bushels per hour;
  - (C) Grain handling from Rail DC to Legs 3 and 4, with a maximum hourly capacity of 17,500 bushels per hour;
  - (D) Grain handling from Bins to Reclaim Conveyors and Spouts, with a maximum hourly capacity of 17,500 bushels per hour; and
  - (E) Grain handling from Reclaim Conveyors to Grain Legs, with a maximum hourly capacity of 17,500 bushels per hour;
- (3) System 3, using a Dacron baghouse, identified as DS-3, for particulate control, exhausting through two (2) Cyclone Dust Collectors, which exhausts back into the grain handling process, consisting of the following emission units:
- (A) Grain handling from Grain Legs to Dual Distributor, with a maximum hourly capacity of 17,500 bushels per hour;
  - (B) Grain handling from Dual Distributor to Tripper or Spouts, with a maximum hourly capacity of 17,500 bushels per hour;
  - (C) Grain handling from Tripper or Spouts to Bins, with a maximum hourly capacity of 17,500 bushels per hour;
  - (D) Grain handling from Legs 3 and 4 to Rail Tank, with a maximum hourly capacity of 17,500 bushels per hour;
  - (E) Grain handling from Rail Shed loadout, with a maximum hourly capacity of 17,500 bushels per hour; and
  - (F) Grain handling from Grain Legs to Dryers, with a maximum hourly capacity of 17,500 bushels per hour;
- (b) Four (4) fugitive emission points from the Truck Dump, Rail Dump, Rail Loadout, and Barge Loadout, identified as FS-1, FS-2, FS-3, and FS-4, respectively.
- (c) Two (2) grain dryers, identified as emission unit ID 4 and 5, constructed in 1994 and 1977 respectively, Unit 4 with a maximum capacity of 4,000 bushels per hour and Unit 5 with a maximum capacity of 3,000 bushels per hour, heated by natural gas, with a heat input rate of thirty-six (36) million Btu (MMBtu) per hour, exhausting through one (1) stack each.
- (d) One (1) truck dump with a maximum capacity of 20,000 bushels per hour, equipped with cyclone.
- (e) One (1) enclosed conveyor system connecting the truck dump to the storage pile with a maximum capacity of 20,000 bushels per hour.
- (f) One (1) dry leg with a maximum capacity of 10,000 bushels per hour.
- (g) Two (2) non-permanent ground storage piles, each with a maximum storage capacity of 1,400,000 bushels of grain.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour [326 IAC 6-2-4].
- (b) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;
- (c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (d) Paved and unpaved roads and parking lots with public access;
- (e) Underground conveyors;
- (f) On-site fire and emergency response training approved by the department; and
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

A.4 FESOP Applicability [326 IAC 2-8-2]

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

## **SECTION B GENERAL CONDITIONS**

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

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

### **B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) This permit, 129-22803-00001, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

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

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

### **B.5 Severability [326 IAC 2-8-4(4)]**

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

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

### **B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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

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

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

B.9 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

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

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 129-22803-00001 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

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

B.17 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

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

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

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

**B.20 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]**

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

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

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

**C.2 Overall Source Limit [326 IAC 2-8]**

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

(a) Pursuant to 326 IAC 2-8:

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

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

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

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

**C.3 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
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 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90), the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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(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.

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

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

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

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

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

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

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## **Stratospheric Ozone Protection**

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

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Three (3) grain elevator systems, identified as emission units ID 1, 2, and 3, with a maximum throughput of forty (40) million bushels of grain per year, using a Dacron baghouse each for control, exhausting through two (2) Cyclone Dust Collectors and the exhaust from dust collectors is collected at a dust collection tank. The three systems are:
- (1) System 1, using a Dacron baghouse, identified as DS-1, for particulate control, exhausting through two (2) Cyclone Dust Collectors, which exhausts back into the grain handling process, consisting of the following emission units:
    - (A) One (1) truck receiving area, identified as Truck Dump #1, with a maximum hourly capacity of 17,500 bushels per hour;
    - (B) One (1) truck receiving area identified as Truck Dump #2, with a maximum hourly capacity of 17,500 bushels per hour;
    - (C) Grain handling from Bin 12 Upper to Grain Scale, with a maximum hourly capacity of 40,000 bushels per hour; and
    - (D) Grain handling from Grain Scale to Hawk Belt, with a maximum hourly capacity of 40,000 bushels per hour;
  - (2) System 2, using a Dacron baghouse, identified as DS-2 for particulate control, exhausting through two (2) Cyclone Dust Collectors, which exhausts back into the grain handling process, consisting of the following emission units:
    - (A) Grain handling from Drag Conveyor DC-1 to Leg 1, with a maximum hourly capacity of 20,000 bushels per hour;
    - (B) Grain handling from Drag Conveyor DC-2 to Leg 2 with a maximum hourly capacity of 20,000 bushels per hour;
    - (C) Grain handling from Rail DC to Legs 3 and 4, with a maximum hourly capacity of 17,500 bushels per hour;
    - (D) Grain handling from Bins to Reclaim Conveyors and Spouts, with a maximum hourly capacity of 17,500 bushels per hour; and
    - (E) Grain handling from Reclaim Conveyors to Grain Legs, with a maximum hourly capacity of 17,500 bushels per hour;
  - (3) System 3, using a Dacron baghouse, identified as DS-3, for particulate control, exhausting through two (2) Cyclone Dust Collectors, which exhausts back into the grain handling process, consisting of the following emission units:
    - (A) Grain handling from Grain Legs to Dual Distributor, with a maximum hourly capacity of 17,500 bushels per hour;
    - (B) Grain handling from Dual Distributor to Tripper or Spouts, with a maximum hourly capacity of 17,500 bushels per hour;
    - (C) Grain handling from Tripper or Spouts to Bins, with a maximum hourly capacity of 17,500 bushels per hour;

(D)	Grain handling from Legs 3 and 4 to Rail Tank, with a maximum hourly capacity of 17,500 bushels per hour;
(E)	Grain handling from Rail Shed loadout, with a maximum hourly capacity of 17, 500 bushels per hour; and
(F)	Grain handling from Grain Legs to Dryers, with a maximum hourly capacity of 17, 500 bushels per hour;
(b)	Four (4) fugitive emission points from the Truck Dump, Rail Dump, Rail Loadout, and Barge Loadout, identified as FS-1, FS-2, FS-3, and FS-4, respectively.
(c)	One (1) truck dump with a maximum capacity of 20,000 bushels per hour, equipped with cyclone.
(d)	One (1) enclosed conveyor system connecting the truck dump to the storage pile with a maximum capacity of 20,000 bushels per hour.
(e)	One (1) dry leg with a maximum capacity of 10,000 bushels per hour.
(f)	Two (2) non-permanent ground storage piles, each with a maximum storage capacity of 1,400,000 bushels of grain.
(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)	

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

**D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions from the equipment listed above shall not exceed the pound per hour emission rate reported below:

Process/Facility	Process Weight Rate	Process Weight Rate	Emission Rate
	bushels/hr	tons/hr	lb/hr
<b>Group 001 Processes</b>			
Truck Dump #1	17,500	525	69.54
Truck Dump #2	17,500	525	69.54
Bin 12 Upper to Grain Scale	40,000	1,200	79.97
Grain Scale to Hawk Belt	40,000	1,200	79.97
<b>Group 002 Processes</b>			
DC1 to Leg 1	20,000	600	71.16
DC2 to Leg 2	20,000	600	71.16
Rail DC to Legs 3 and 4	17,500	525	69.54
Bins to Reclaim Conveyors and Spouts	17,500	525	69.54
Reclaim Conveyors to Grain Legs	17,500	525	69.54
<b>Group 003 Processes</b>			
Grain Legs to Dual Distributor	17,500	525	69.54
Dual Distributor to Tripper	17,500	525	69.54
Tripper or Spouts to Bins	17,500	525	69.54
Legs 3 and 4 to Rail Tank	17,500	525	69.54
Rail Shed Loadout	17,500	525	69.54
Grain Legs to Dryers	17,500	525	69.54

Process/Facility	Process Weight Rate	Process Weight Rate	Emission Rate
<b>Two Non-Permanent Storage Piles/Truck Receiving</b>			
Hopper Truck	20,000	600	71.16
Transfer Point	20,000	600	71.16

These limitations were based on the following:

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

$$E = 55.0 P^{0.11} - 40$$

Where E = rate of emission in pounds per hour and  
 P = process weight rate in tons per hour

**D.1.2 Particulate Emissions Limit [326 IAC 2-2] [326 IAC 2-8-4]**

- (a)
- (1) The grain elevators throughput shall be limited to less than forty million (40,000,000) bushels of grain per 12 consecutive month period.
  - (2) The PM emissions from the receiving units shall be limited to 0.035 pounds per ton of grain.
  - (3) The PM emissions from the shipping, handling, and loadout units shall be limited to 0.061 pounds per ton of grain.
  - (4) The PM emissions from the rail shed loadout shall be limited to 0.27 pounds per ton of grain.
  - (5) The PM emissions from the drying units shall be limited to 0.2 pounds per ton of grain.

Note: These PM emission factors, in lb/ton are obtained from US EPA's AP-42, Section 9.9.1, Table 9.9.1-1.

These limits are required to limit the source-wide potential to emit particulate matter to below 250 tons per year. Compliance with this limit and the use of the baghouses makes 326 IAC 2-2 not applicable.

- (b)
- The source will limit PM<sub>10</sub> emissions to less than 100 tons per year (22.83 lb/hr) as shown below:
- (1) The PM<sub>10</sub> emissions from the receiving units shall be limited to 0.0078 pounds per ton of grain.
  - (2) The PM<sub>10</sub> emissions from the shipping, handling, and loadout units shall be limited to 0.034 pounds per ton of grain.
  - (3) The PM<sub>10</sub> emissions from the rail shed loadout shall be limited to 0.22 pounds per ton of grain.
  - (4) The PM<sub>10</sub> emissions from the drying units shall be limited to 0.055 pounds per ton of grain.

Note: These PM<sub>10</sub> emission factors, in lb/ton are obtained from US EPA's AP-42, Section 9.9.1, Table 9.9.1-1.

These limits are required to limit the source-wide potential to emit PM<sub>10</sub> to below 100 tons per year. This will render 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 not applicable.

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

### **D.1.3 Particulate Control**

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- (a) In order to comply with D.1.1 and D.1.2 the baghouses shall be in operation at all times that the facilities mentioned above 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.1.4 Parametric Monitoring**

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The Permittee shall record the static pressure drop across the baghouses used in conjunction with the process mentioned above, at least daily when the processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the normal range of 2.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

### **D.1.5 Broken or Failed Bag Detection**

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- (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 emissions unit. 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.1.6 Cyclone Failure Detection**

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In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### D.1.7 Visible Emissions Notations

---

- (a) Daily visible emission notations of the DS-1 through DS-3 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere and combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

#### D.1.8 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.2 the Permittee shall maintain records of the bushels of grain processed.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain the following:
  - (1) Once per day records of pressure drop.
  - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain a log of daily inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

---

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

Two (2) grain dryers, identified as emission unit ID 4 and 5, constructed in 1994 and 1977 respectively, Unit 4 with a maximum capacity of 4,000 bushels per hour and Unit 5 with a maximum capacity of 3,000 bushels per hour, heated by natural gas, with a heat input rate of thirty-six (36) million Btu (MMBtu) per hour, exhausting through one (1) stack each.

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

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

**D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions from the equipment listed above shall not exceed the pound per hour emission rate reported below:

Process/Facility	Process Weight Rate (bushels/hr)	Process Weight Rate (ton/hr)	Emission Rate (lb/hr)
<b>Dryers</b>			
Meyer Dryer	4,000	120	53.13
Berico Dryer	3,000	90	50.23

These limitations were based on the following:

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

$$E = 55.0 P^{0.11} - 40$$

Where E = rate of emission in pounds per hour and  
 P = process weight rate in tons per hour

**D.2.2 Particulate Emissions Unit [326 IAC 2-2] [326 IAC 2-8]**

(a) The source will limit PM and PM<sub>10</sub> emissions to less than 250 tons per year as shown below:

- (1) The grain elevators throughput shall be limited to less than forty million (40,000,000) bushels of grain per 12 consecutive month period.
- (2) The PM emissions from the receiving units shall be limited to 0.035 pounds per ton of grain.
- (3) The PM emissions from the shipping, handling, and loadout units shall be limited to 0.061 pounds per ton of grain.
- (4) The PM emissions from the rail shed loadout shall be limited to 0.27 pounds per ton of grain.
- (5) The PM emissions from the drying units shall be limited to 0.2 pounds per ton of grain.

These limits are required to limit the source-wide potential to emit particulate matter to below 250 tons per year. Compliance with this limit and the use of the baghouses makes 326 IAC 2-2 not applicable.

- (b) The source will limit PM<sub>10</sub> emissions to less than 100 tons per year as shown below:
- (1) The PM<sub>10</sub> emissions from the receiving units shall be limited to 0.0078 pounds per ton of grain.
  - (2) The PM<sub>10</sub> emissions from the shipping, handling, and loadout units shall be limited to 0.034 pounds per ton of grain.
  - (3) The PM<sub>10</sub> emissions from the rail shed loadout shall be limited to 0.22 pounds per ton of grain.
  - (4) The PM<sub>10</sub> emissions from the drying units shall be limited to 0.055 pounds per ton of grain.

These limits are required to limit the source-wide potential to emit PM<sub>10</sub> to below 100 tons per year. This will render 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 not applicable.

#### D.2.3 Visible Emissions Notations

---

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

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

#### D.2.4 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records of the bushels of grain processed.
- (b) To document compliance with Condition D.2.3, the Permittee shall maintain records of visible emission notations of the grain dryer stacks exhaust once per day or a record of the reason why visible emission notations were not taken.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.5 Reporting Requirements

---

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, with thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

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

Source Name: Cargill AgHorizons  
Source Address: Uniontown Road, Mt. Vernon, Indiana 47620  
Mailing Address: P.O. Box 747, Mt. Vernon, Indiana 47620  
FESOP No.: F129-22803-00001

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

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

Source Name: Cargill AgHorizons  
Source Address: Uniontown Road, Mt. Vernon, Indiana 47620  
Mailing Address: P.O. Box 747, Mt. Vernon, Indiana 47620  
FESOP No.: F129-22803-00001

**This form consists of 2 pages**

**Page 1 of 2**

- |   |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|---|

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

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

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

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

**FESOP Quarterly Report**

Source Name: Cargill AgHorizons  
Source Address: Uniontown Road, Mt. Vernon, Indiana 47620  
Mailing Address: P.O. Box 747, Mt. Vernon, Indiana 47620  
FESOP No.: F129-22803-00001  
Facility: Grain Elevators 1-3, Grain Dryers and Two (2) non-permanent storage piles  
Parameter: Bushels of grain processed  
Limit: 40,000,000 Bushels per 12 consecutive month period

YEAR: \_\_\_\_\_

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

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

Source Name: Cargill AgHorizons  
Source Address: Uniontown Road, Mt. Vernon, Indiana 47620  
Mailing Address: P.O. Box 747, Mt. Vernon, Indiana 47620  
FESOP No.: F129-22803-00001

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

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

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

Addendum to the  
Technical Support Document for Federally Enforceable State Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Cargill AgHorizons</b>
<b>Source Location:</b>	<b>1000 Old SR 69 S (Uniontown Road), Mount Vernon, Indiana 47620</b>
<b>County:</b>	<b>Posey</b>
<b>SIC Code:</b>	<b>5153</b>
<b>Permit Renewal No.:</b>	<b>F129-22803-00001</b>
<b>Permit Reviewer:</b>	<b>Surya Ramaswamy/EVP</b>

April 18, 2007, the Office of Air Quality (OAQ) had a notice published in the Mount Vernon Democrat Newspaper in Mount Vernon, Indiana, stating that The Cargill AgHorizons had applied for a Federally Enforceable Source Operating Permit (FESOP) Renewal to continue to operate a wholesale grain processing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

After review, IDEM, OAQ has made the following modifications:

1. All occurrences of IDEM's mailing addresses have been updated in the permit. Any occurrences of the zip code 46204 have been revised to **46204-2251**, and all addresses have been revised to include a mail code (MC) as follows:

Asbestos Section:	<b>MC 61-52 IGCN 1003</b>
Compliance Branch:	<b>MC 61-53 IGCN 1003</b>
Permits Branch:	<b>MC 61-53 IGCN 1003</b>
Technical Support and Modeling Section:	<b>MC 61-50 IGCN 1003</b>

2. The Table of Contents has been updated to match the conditions in Sections A, B, C, D and E.
3. Conditions C.2, C.5, and C.16 have been revised as shown below:

**C.2 Overall Source Limit [326 IAC 2-8]**

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit of PM<sub>10</sub> from the entire source shall be limited to less than ~~one hundred~~ **one hundred** (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than ~~twenty five~~ **twenty five** (25) tons per twelve (12) consecutive month period.

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

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

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- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in ~~one hundred and twenty~~ **one hundred twenty** (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit  
(FESOP) Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Cargill AgHorizons</b>
<b>Source Location:</b>	<b>1000 Old SR 69 S (Uniontown Road), Mount Vernon, Indiana 47620</b>
<b>County:</b>	<b>Posey</b>
<b>SIC Code:</b>	<b>5153</b>
<b>Operation Permit No.:</b>	<b>F 129-12502-00001</b>
<b>Operation Permit Issuance Date:</b>	<b>December 20, 2001</b>
<b>Permit Renewal No.:</b>	<b>F129-22803-00001</b>
<b>Permit Reviewer:</b>	<b>Surya Ramaswamy/EVP</b>

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Cargill AgHorizons relating to the operation of a wholesale grain processing plant.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) Three (3) grain elevator systems, identified as emission units ID 1, 2, and 3, with a maximum throughput of forty (40) million bushels of grain per year, using a Dacron baghouse each for control, exhausting through two (2) Cyclone Dust Collectors and the exhaust from dust collectors is collected at a dust collection tank. The three systems are:
  - (1) System 1, using a Dacron baghouse, constructed in 1975, identified as DS-1, for particulate control, exhausting through two (2) Cyclone Dust Collectors, consisting of the following emission units:
    - (A) One (1) truck receiving area, identified as Truck Dump #1, with a maximum hourly capacity of 17,500 bushels per hour.
    - (B) One (1) truck receiving area identified as Truck Dump #2, with a maximum hourly capacity of 17,500 bushels per hour.
    - (C) Grain handling from Bin 12 Upper to Grain Scale, with a maximum hourly capacity of 40,000 bushels per hour; and
    - (D) Grain handling from Grain Scale to Hawk Belt, with a maximum hourly capacity of 40,000 bushels per hour.
  - (2) System 2, using a Dacron baghouse, constructed in 1975, identified as DS-2 for particulate control, exhausting through two (2) Cyclone Dust Collectors, consisting of the following emission units:
    - (A) Grain handling from Drag Conveyor DC-1 to Leg 1, with a maximum hourly capacity of 20,000 bushels per hour.

- (B) Grain handling from Drag Conveyor DC-2 to Leg 2 with a maximum hourly capacity of 20,000 bushels per hour.
  - (C) Grain handling from Rail DC to Legs 3 and 4, with a maximum hourly capacity of 17,500 bushels per hour.
  - (D) Grain handling from Bins to Reclaim Conveyors and Spouts, with a maximum hourly capacity of 17,500 bushels per hour; and
  - (E) Grain handling from Reclaim Conveyors to Grain Legs, with a maximum hourly capacity of 17,500 bushels per hour.
- (3) System 3, using a Dacron baghouse, constructed in 1975, identified as DS-3, for particulate control, exhausting through two (2) Cyclone Dust Collectors, consisting of the following emission units:
- (A) Grain handling from Grain Legs to Dual Distributor, with a maximum hourly capacity of 17,500 bushels per hour.
  - (B) Grain handling from Dual Distributor to Tripper or Spouts, with a maximum hourly capacity of 17,500 bushels per hour.
  - (C) Grain handling from Tripper or Spouts to Bins, with a maximum hourly capacity of 17,500 bushels per hour;
  - (D) Grain handling from Legs 3 and 4 to Rail Tank, with a maximum hourly capacity of 17,500 bushels per hour.
  - (E) Grain handling from Rail Shed loadout, with a maximum hourly capacity of 17,500 bushels per hour; and
  - (F) Grain handling from Grain Legs to Dryers, with a maximum hourly capacity of 17,500 bushels per hour.
- (b) Four (4) fugitive emission points from the Truck Dump, Rail Dump, Rail Loadout, and Barge Loadout, identified as FS-1, FS-2, FS-3, and FS-4, respectively; and
- (c) Two (2) grain dryers, identified as emission unit ID 4 and 5, constructed in 1994 and 1977 respectively, Unit 4 with a maximum capacity of 4,000 bushels per hour and Unit 5 with a maximum capacity of 3,000 bushels per hour, heated by natural gas, with a heat input rate of thirty-six (36) million Btu (MMBtu) per hour, exhausting through one (1) stack each.

### **Unpermitted Emission Units and Pollution Control Equipment**

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

- (a) Two (2) non-permanent ground storage piles, constructed in 2005, each with a maximum storage capacity of 1,400,000 bushels of grain.
- (b) One (1) truck dump, constructed in 2005, with a maximum capacity of 20,000 bushels per hour, equipped with cyclone.
- (c) One (1) enclosed conveyor system, constructed in 2005, connecting the truck dump to the storage pile with a maximum capacity of 20,000 bushels per hour.

- (d) One (1) dry leg, constructed in 2005, with a maximum capacity of 10,000 bushels per hour.
- (e) One (1) ground storage piles, constructed in 2005, with a maximum storage capacity of 1,300,000 bushels of grain; and
- (f) One (1) ground storage piles, constructed in 2005, with a maximum storage capacity of 800,000 bushels of grain.

### **Emission Units and Pollution Control Equipment Removed From This Source**

The following permitted emission units have been removed from this source:

- (a) A temporary grain storage pile, with a maximum storage capacity of 2,000,000 bushels of grain, covered by a tarp.

### **Insignificant Activities**

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour [326 IAC 6-2-4].
- (b) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (d) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (e) Underground conveyors.
- (f) On-site fire and emergency response training approved by the department; and
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

### **Existing Approvals**

The source has been operating under the previous FESOP 129-12502-00001 issued on December 20, 2001. The source has since received the following:

- (a) First Administrative Amendment 129-19671-00001, issued on November 18, 2004;
- (b) First Interim Permit 129-207651-00001, issued on March 8, 2005; and
- (c) Second Administrative Amendment 129-20730-00001, issued on April 1, 2005.

## Enforcement Issue

- (a) IDEM is aware that equipment has been operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment. The source was issued an Interim Permit 129-207651-00001, on March 8, 2005 only for the construction of the emission units listed under Section Unpermitted Emission Units; however, the source began operating these emission units without prior approval.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

## Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on March 15, 2006.

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

## Emission Calculations

See pages 1 through 10 of Appendix A of this document for detailed emissions calculations.

## Unrestricted Potential Emissions

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

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

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	728.03
PM-10	366.44
SO <sub>2</sub>	0.18
VOC	1.74
CO	31.54
NO <sub>x</sub>	26.5

HAPs	Potential To Emit (tons/yr)
Hexane	$5.68 \times 10^{-1}$
Others	$2.8 \times 10^{-2}$
<b>TOTAL</b>	$5.96 \times 10^{-1}$

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM<sub>10</sub> is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its PM<sub>10</sub> emissions below the Title V levels.
- (b) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Potential to Emit After Issuance**

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
<b>Group 001 Processes</b>							
Truck Dump #1	0.089	0.02	--	--	--	--	--
Truck Dump #2	0.089	0.02	--	--	--	--	--
Bin 12 Upper to Grain Scale	0.31	0.17	--	--	--	--	--
Grain Scale to Hawk Belt	0.31	0.17	--	--	--	--	--
<b>Subtotal:</b>	<b>0.798</b>	<b>0.38</b>	--	--	--	--	--
<b>Group 002 Processes</b>							
DC1 to Leg 1	0.16	0.087	--	--	--	--	--
DC2 to Leg 2	0.16	0.087	--	--	--	--	--
Rail DC to Legs 3 and 4	0.035	0.019	--	--	--	--	--
Bins to Reclaim Conveyors and Spouts	0.69	0.39	--	--	--	--	--
Reclaim Conveyors to Grain Legs	0.69	0.39	--	--	--	--	--
<b>Subtotal:</b>	<b>1.735</b>	<b>0.973</b>	--	--	--	--	--
<b>Group 003 Processes</b>							
Grain Legs to Dual Distributor	0.69	0.39	--	--	--	--	--
Dual Distributor to Tripper	0.69	0.39	--	--	--	--	--
Tripper or Spouts to Bins	0.69	0.39	--	--	--	--	--
Legs 3 and 4 to Rail Tank	0.035	0.019	--	--	--	--	--
Rail Shed Loadout	0.15	0.12	--	--	--	--	--
Grain Legs to Dryers	0.35	0.19	--	--	--	--	--
<b>Subtotal:</b>	<b>2.605</b>	<b>1.499</b>	--	--	--	--	--

Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
<b>Dryers</b>							
Meyer Dryer	23.83	7.42	0.09	0.87	13.25	15.77	0
Berico Dryer	23.83	7.42	0.09	0.87	13.25	15.77	0
<b>Subtotal:</b>	<b>47.66</b>	<b>14.84</b>	--	--	--	--	--
<b>Two Non-Permanent Storage Piles/Truck Receiving</b>							
Hopper Truck	1.96	0.44	--	--	--	--	--
Transfer Point	5.29	2.95	--	--	--	--	--
<b>Fugitive Emission</b>							
Paved Roads	21.06	2.22	--	--	--	--	--
Storage Pile	0.02	0.01	--	--	--	--	--
<b>Total</b>	<b>81.11</b>	<b>23.30</b>	<b>0.18</b>	<b>1.74</b>	<b>26.5</b>	<b>31.54</b>	<b>0</b>

### County Attainment Status

The source is located in Posey County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 emissions and NO<sub>x</sub> are considered when evaluating the rule applicability relating to ozone. Posey County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO<sub>x</sub> were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Posey County has been classified as 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 surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Posey County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.

## Source Status

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

Pollutant	Emissions (tons/yr)
PM	81.11
PM-10	23.30
SO <sub>2</sub>	0.18
VOC	1.74
CO	26.5
NO <sub>x</sub>	31.54
Single HAP	Single <10
Combination HAPs	Total <25

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions are based on the emission calculations (Appendix A) in this FESOP Permit.

## Federal Rule Applicability

### 40 CFR Subpart 60.300, Subpart DD - Standards of Performance for Grain Elevators

The New Source Performance Standard, 326 IAC 12, 40 CFR Part 60, Subpart DD (Standards of Performance for Grain Elevators) are not included in this permit, although the combined storage capacity of the storage piles are greater than 2.5 million bushels, because these storage piles, each with a maximum storage capacity of 1.4 million bushels of grain are classified as non-permanent based on the information from source. This source is also not considered as a grain storage elevator as defined in 40 CFR 60.301(f) because it is not associated with any mill or oil extraction plant.

All the other emission units at the facility including truck unloading and loading stations, internal grain handling, grain receiving, shipping and dyers are not subject to the requirements of 40 CFR Part 60.300, Subpart DD as the storage piles are classified as non-permanent.

### 40 CFR 63 and 326 IAC 14 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)

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

### 40 CFR 64.2 Compliance Assurance Monitoring (CAM)

The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Generally, such requirements apply to a Part 70 source that involves a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, that meets the following criteria:

- (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
- (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
- (3) the unit has a potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

As a FESOP source, this source has accepted federally enforceable limits such that the requirements of 326 IAC 2-7 (Part 70) do not apply. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

### State Rule Applicability – Entire Source

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

This source is not subject to this rule because it is not one of the 28 listed source categories, and it will limit PM and PM<sub>10</sub> emissions to less than 250 tons per year as shown below:

- (a) The grain elevators throughput shall be limited to less than forty million (40,000,000) bushels of grain per 12 consecutive month period.
- (b) The PM emissions from the receiving units shall be limited to 0.035 pounds per ton of grain.
- (c) The PM emissions from the shipping, handling, and loadout units shall be limited to 0.061 pounds per ton of grain.
- (d) The PM emissions from the rail shed loadout shall be limited to 0.27 pounds per ton of grain.
- (e) The PM emissions from the drying units shall be limited to 0.2 pounds per ton of grain.

Note: These PM emission factors, in lb/ton are obtained from US EPA's AP-42, Section 9.9.1, Table 9.9.1-1.

These limits are required to limit the source-wide potential to emit particulate matter to below 250 tons per year. Compliance with this limit and the use of the baghouses makes 326 IAC 2-2 not applicable.

#### 326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 2-8-4 (FESOP)

The source will limit PM<sub>10</sub> emissions to less than 100 tons per year (22.83 lb/hr) as shown below:

- (a) The PM<sub>10</sub> emissions from the receiving units shall be limited to 0.0078 pounds per ton of grain.
- (b) The PM<sub>10</sub> emissions from the shipping, handling, and loadout units shall be limited to 0.034 pounds per ton of grain.
- (c) The PM<sub>10</sub> emissions from the rail shed loadout shall be limited to 0.22 pounds per ton of grain.
- (d) The PM<sub>10</sub> emissions from the drying units shall be limited to 0.055 pounds per ton of grain.

Note: These PM<sub>10</sub> emission factors, in lb/ton are obtained from US EPA's AP-42, Section 9.9.1, Table 9.9.1-1.

These limits are required to limit the source-wide potential to emit PM<sub>10</sub> to below 100 tons per year. This will render 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 not applicable.

#### 326 IAC 5-1 (Opacity Limitations)

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

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

**326 IAC 6-4 (Fugitive Dust Emissions)**

The Permittee shall not allow fugitive dust to escape beyond 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). 326 IAC 6-4-2(4) is not federally enforceable.

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

This source is subject to 326 IAC 6-5, since it is a new source of fugitive particulate matter emissions, requiring a permit as set forth in 326 IAC 2, and which has not received all the necessary preconstruction approvals before December 13, 1985. Pursuant to 326 IAC 6-5, a fugitive dust control plan must be submitted, reviewed and approved.

**326 IAC 2-4.1-1 (New Source Toxics Control)**

All the facilities at this source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**State Rule Applicability – Individual Facilities**

**326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)**

The particulate matter (PM) from the receiving, handling, drying, and shipping facilities shall be limited to the potential controlled emissions as reported below:

Process/Facility	Process Weight Rate	Process Weight Rate	Allowable Emission Rate
	bushels/hr	tons/hr	lb/hr
<b>Group 001 Processes</b>			
Truck Dump #1	17,500	525	69.54
Truck Dump #2	17,500	525	69.54
Bin 12 Upper to Grain Scale	40,000	1,200	79.97
Grain Scale to Hawk Belt	40,000	1,200	79.97
<b>Group 002 Processes</b>			
DC1 to Leg 1	20,000	600	71.16
DC2 to Leg 2	20,000	600	71.16
Rail DC to Legs 3 and 4	17,500	525	69.54
Bins to Reclaim Conveyors and Spouts	17,500	525	69.54
Reclaim Conveyors to Grain Legs	17,500	525	69.54
<b>Group 003 Processes</b>			
Grain Legs to Dual Distributor	17,500	525	69.54
Dual Distributor to Tripper	17,500	525	69.54
Tripper or Spouts to Bins	17,500	525	69.54
Legs 3 and 4 to Rail Tank	17,500	525	69.54
Rail Shed Loadout	17,500	525	69.54
Grain Legs to Dryers	17,500	525	69.54
<b>Dryers</b>			

Meyer Dryer	4,000	120	53.13
Berico Dryer	3,000	90	50.23
<b>Two Non-Permanent Storage Piles/Truck Receiving</b>			
Hopper Truck	20,000	600	71.16
Transfer Point	20,000	600	71.16

These limitations were based on the following:

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

$$E = 55.0 P^{0.11} - 40$$

Where E = rate of emission in pounds per hour and  
 P = process weight rate in tons per hour

The baghouses shall be in operation at all times these facilities are in operation, in order to comply with these limits.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

The baghouses DS-1 through DS-3 and grain dryers, identified as emission unit ID 4 and 5 have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emission notations of the DS-1 through DS-3 and grain dryers stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere and combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (f) 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).
- (g) 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 emissions unit. 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.

- (h) In the event that cyclone failure has been observed:  
  
Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse for the grain elevator systems process must operate properly to ensure compliance with 326 IAC 6-3 (Particulate emission limitations, work practices, and control technologies), 326 IAC 2-2 and 326 IAC 2-8 (FESOP).

## Conclusion

The operation of this wholesale grain processing source shall be subject to the conditions of the attached proposed **FESOP 129-22803-00001**.

**Appendix A: Emissions Calculations**

**Company Name:** Cargill AgHorizons  
**Address City IN Zip:** Uniontown Road, Mt. Vernon, IN 47620  
**Permit No.:** F129-22803-00001  
**Reviewer:** Surya Ramaswamy/EVP  
**Date:** 06/29/07

**Emissions Before Control**

Emission Unit	Group 1	Group 2	Group 3	Grain Dryer	Storage Pile	Truck Dump	Paved Roads	Total
Unit ID	DS-1	DS-2	DS-3	Unit 4 & 5				
Pollutant								
PM	79.93	172.53	260.27	47.66	0.02	125.50	42.12	728.03
PM10	38.59	96.17	149.00	14.85	0.01	63.39	4.44	366.44
SO2	0.00	0.00	0.00	0.18	0.00	0.00	0.00	0.18
VOC	0.00	0.00	0.00	1.74	0.00	0.00	0.00	1.74
NOx	0.00	0.00	0.00	31.54	0.00	0.00	0.00	31.54
CO	0.00	0.00	0.00	26.50	0.00	0.00	0.00	26.50

**Emissions After Control**

Emission Unit	Group 1	Group 2	Group 3	Grain Dryer	Storage Pile	Truck Dump	Paved Roads	Total
Unit ID	DS-1	DS-2	DS-3	Unit 4 & 5				
Pollutant								
PM	0.80	1.73	2.60	47.66	0.02	7.25	21.06	81.11
PM10	0.39	0.96	1.49	14.85	0.01	3.39	2.22	23.30
SO2	0.00	0.00	0.00	0.18	0.00	0.00	0.00	0.18
VOC	0.00	0.00	0.00	1.74	0.00	0.00	0.00	1.74
NOx	0.00	0.00	0.00	31.54	0.00	0.00	0.00	31.54
CO	0.00	0.00	0.00	26.50	0.00	0.00	0.00	26.50

**Appendix A: Emissions Calculations**

**Grain Elevator**

**Small Country Terminal Elevator (Group 001 Processes)**

**Company Name:** Cargill AgHorizons

**Address City IN Zip:** Uniontown Road, Mt. Vernon, IN 47620

**Permit No.:** 129-22803-00001

**Reviewer:** Surya Ramaswamy/EVP

**Date:** 6/29/2007

ACTUAL HOURS OF OPERATION	
Hours per day:	24
Days per week:	7
Weeks per year:	52
<b>HOURS PER YEAR:</b>	<b>8760</b>

Limited Potential Scenario	Limited Throughput in Bushels	% Contribution
Truck Dump#1	18,000,000	45%
Truck Dump#2	18,000,000	45%
Rail	4,000,000	10%
	<b>40,000,000</b>	

BUSHEL PER YEAR	Actual Throughput in Bushels	% Cont	Limited Potential (bushels)	Conversion	Limited Potential (tons of grain)
Corn:	13,700,000	58.472%	23,388,818	56	654,887
Bean:	6,400,000	27.315%	10,926,163	56	305,933
Wheat:	2,850,000	12.164%	4,865,557	60	145,967
Milo:	480,000	2.049%	819,462	60	24,584
<b>Total</b>	<b>23,430,000</b>	<b>100%</b>	<b>40,000,000</b>		<b>1,131,370</b>

Group001 Emission Point	Emission Process	Processing Rate (tpy)	Processing Rate (pound per hour)	PM Emission Factor	PM Emissions (tpy)	PM10 Emission Factor	PM10 Emissions (tpy)	Control Efficiency (%)	Controlled PM Emissions (tpy)	Controlled PM-10 Emissions (tpy)
Truck Dump #1	Receiving	509,117	116,237	0.035	8.910	0.0078	1.986	99.00%	0.089	0.020
Truck Dump #2	Receiving	509,117	116,237	0.035	8.910	0.0078	1.986	99.00%	0.089	0.020
Bin 12 Upper to grain scale	Shipping	1,018,233	232,473	0.061	31.056	0.034	17.310	99.00%	0.311	0.173
Grain scale to hawk belt	Shipping	1,018,233	232,473	0.061	31.056	0.034	17.310	99.00%	0.311	0.173
	<b>TOTAL =</b>				<b>79.931</b>		<b>38.591</b>		<b>0.799</b>	<b>0.386</b>

**Methodology**

Emission factors are from AP-42 Table 9.9.1-1 Particulate Emission Factors for Uncontrolled Grain Elevators (5th Edition Supplement 1998)

Actual throughput of 23 million bushels in a year were scaled to the maximum of 40 million bushels

Potential Emissions in ton/yr = Processing Rate \* Emission Factor / 2000 (lbs/ton)

Conversion factor of 56 is used to convert bushels to tons of Corn and Bean.

Conversion factor of 60 is used to convert bushels to tons of Wheat and Milo.

AP-42 9.9.1-1 - Country elevators are generally smaller elevators that receive grain by truck directly from farms during harvest season. Terminal elevators dry, clean, blend and store grain for shipment to other terminals or processors, or for export. These elevators may receive grain by truck, rail, or barge, and generally have greater grain handling and storage capacities than country elevators.

**Appendix A: Emissions Calculations****Grain Elevator****Small Country Terminal Elevator (Group 002 Processes)****Company Name:** Cargill AgHorizons**Address City IN Zip:** Uniontown Road, Mt. Vernon, IN 47620**Permit No.:** 129-22803-00001**Reviewer:** Surya Ramaswamy/EVP**Date:** 6/29/2007

ACTUAL HOURS OF OPERATION		Limited Potential Scenario	Limited Throughput in Bushels	% Contribution
Hours per day:	24	Truck Dump#1	18,000,000	45%
Days per week:	7	Truck Dump#2	18,000,000	45%
Weeks per year:	52	Rail	4,000,000	10%
<b>HOURS PER YEAR:</b>	<b>8760</b>		<b>40,000,000</b>	

BUSHEL PER YEAR	Actual	% Cont	Limited Potential (bushels)	Conversion	Limited Potential (tons of grain)
Corn:	13,700,000	58.472%	23,388,818	56	654,887
Bean:	6,400,000	27.315%	10,926,163	56	305,933
Wheat:	2,850,000	12.164%	4,865,557	60	145,967
Milo:	480,000	2.049%	819,462	60	24,584
<b>Total</b>	<b>23,430,000</b>	<b>100%</b>	<b>40,000,000</b>		<b>1,131,370</b>

Group002 Emission Point	Emission Process	Processing Rate (tpy)	Processing Rate (pound per hour)	PM Emission Factor	PM Emissions (tpy)	PM10 Emission Factor	PM10 Emissions (tpy)	Control Efficiency (%)	Controlled PM Emissions (tpy)	Controlled PM-10 Emissions (tpy)
DC1 to Leg 1	Handling	509,117	116,237	0.061	15.528	0.034	8.655	99.00%	0.155	0.087
DC2 to Leg 2	Handling	509,117	116,237	0.061	15.528	0.034	8.655	99.00%	0.155	0.087
Rail DC to Legs 3 and 4	Handling	113,137	25,830	0.061	3.451	0.034	1.923	99.00%	0.035	0.019
Bins to Reclaim Conveyors and Spouts	Handling	2,262,740	516,607	0.061	69.014	0.034	38.467	99.00%	0.690	0.385
Reclaim Conveyors to Grain Legs	Loadout	2,262,740	516,607	0.061	69.014	0.034	38.467	99.00%	0.690	0.385
	<b>TOTAL =</b>				<b>172.534</b>		<b>96.166</b>		<b>1.725</b>	<b>0.962</b>

**Methodology**

Emission factors are from AP-42 Table 9.9.1-1 Particulate Emission Factors for Uncontrolled Grain Elevators (5th Edition Supplement 1998)

Actual throughput of 23 million bushels in a year were scaled to the maximum of 40 million bushels

Potential Emissions in ton/yr = Processing Rate \* Emission Factor / 2000 (lbs/ton)

Conversion factor of 56 is used to convert bushels to tons of Corn and Bean.

Conversion factor of 60 is used to convert bushels to tons of Wheat and Milo.

AP-42 9.9.1-1 - Country elevators are generally smaller elevators that receive grain by truck directly from farms during harvest season. Terminal elevators dry, clean, blend and store grain for shipment to other terminals or processors, or for export. These elevators may receive grain by truck, rail, or barge, and generally have greater grain handling and storage capacities than country elevators.

**Appendix A: Emissions Calculations**

**Grain Elevator**

**Small Country Terminal Elevator (Group 003 Processes)**

**Company Name:** Cargill AgHorizons  
**Address City IN Zip:** Uniontown Road, Mt. Vernon, IN 47620  
**Permit No.** 129-22803-00001  
**Reviewer:** Surya Ramaswamy/EVP  
**Date:** 6/29/2007

ACTUAL HOURS OF OPERATION	
Hours per day:	24
Days per week:	7
Weeks per year:	52
<b>HOURS PER YEAR:</b>	<b>8760</b>

Limited Potential Scenario	Limited Throughput in Bushels	% Contribution
Truck Dump#1	18,000,000	45%
Truck Dump#2	18,000,000	45%
Rail	4,000,000	10%
	<b>40,000,000</b>	

BUSHEL PER YEAR	Actual	% Cont	Limited Potential (bushels)	Conversion	Limited Potential (tons of grain)
Corn:	13,700,000	58.472%	23,388,818	56	654,887
Bean:	6,400,000	27.315%	10,926,163	56	305,933
Wheat:	2,850,000	12.164%	4,865,557	60	145,967
Milo:	480,000	2.049%	819,462	60	24,584
<b>Total</b>	<b>23,430,000</b>	<b>100%</b>	<b>40,000,000</b>		<b>1,131,370</b>

Group003 Emission Point	Emission Process	Processing Rate (tpy)	Processing Rate (pound per hour)	PM Emission Factor	PM Emissions (tpy)	PM10 Emission Factor	PM10 Emissions (tpy)	Control Efficiency (%)	Controlled PM Emissions (tpy)	Controlled PM-10 Emissions (tpy)
Grain Legs to Dual Distributor	Handling	2,262,740	516,607	0.061	69.014	0.034	38.467	99.00%	0.690	0.385
Dual Distributor to Tripper or Spo	Handling	2,262,740	516,607	0.061	69.014	0.034	38.467	99.00%	0.690	0.385
Tripper or Spouts to Bins	Handling	2,262,740	516,607	0.061	69.014	0.034	38.467	99.00%	0.690	0.385
Legs 3 and 4 to Rail Tank	Handling	113,137	25,830	0.061	3.451	0.034	1.923	99.00%	0.035	0.019
Rail Shed Loadout	Loadout	113,137	25,830	0.27	15.273	0.22	12.445	99.00%	0.153	0.124
Grain Legs to Dryers	Handling	1,131,370	258,304	0.061	34.507	0.034	19.233	99.00%	0.345	0.192
	<b>TOTAL =</b>				<b>260.272</b>		<b>149.001</b>		<b>2.603</b>	<b>1.490</b>

**Methodology**

Emission factors are from AP-42 Table 9.9.1-1 Particulate Emission Factors for Uncontrolled Grain Elevators (5th Edition Supplement 1998)

Actual throughput of 23 million bushels in a year were scaled to the maximum of 40 million bushels

Potential Emissions in ton/yr = Processing Rate \* Emission Factor / 2000 (lbs/ton)

Conversion factor of 56 is used to convert bushels to tons of Corn and Bean.

Conversion factor of 60 is used to convert bushels to tons of Wheat and Milo.

AP-42 9.9.1-1 - Country elevators are generally smaller elevators that receive grain by truck directly from farms during harvest season. Terminal elevators dry, clean, blend and store grain for shipment to other terminals or processors, or for export. These elevators may receive grain by truck, rail, or barge, and generally have greater grain handling and storage capacities than country elevators.

**Appendix A: Emissions Calculations**

**Grain Elevator**

**Small Country Terminal Elevator (Dryer Emissions)**

**Company Name:** Cargill AgHorizons  
**Address City IN Zip:** Uniontown Road, Mt. Vernon, IN 47620  
**Permit No.:** 129-22803-00001  
**Reviewer:** Surya Ramaswamy/EVP  
**Date:** 6/29/2007

ACTUAL HOURS OF OPERATION		Limited Potential Scenario	Limited Throughput in Bushels	% Contribution
Hours per day:	24	Truck Dump#1	18,000,000	45%
Days per week:	7	Truck Dump#2	18,000,000	45%
Weeks per year:	52	Rail	4,000,000	10%
<b>HOURS PER YEAR:</b>	<b>8760</b>		<b>40,000,000</b>	

BUSHEL PER YEAR	Actual	% Cont	Limited Potential (bushels)	Conversion	Limited Potential (tons of grain)
Corn:	13,700,000	58.472%	23,388,818	56	654,887
Bean:	6,400,000	27.315%	10,926,163	56	305,933
Wheat:	2,850,000	12.164%	4,865,557	60	145,967
Milo:	480,000	2.049%	819,462	60	24,584
<b>Total</b>	<b>23,430,000</b>	<b>100%</b>	<b>40,000,000</b>		<b>1,131,370</b>

Dryer Emission Point	Emission Process	Processing Rate (tpy)	Processing Rate (pound per hour)	PM Emission Factor	PM Emissions (tpy)	PM10 Emission Factor	PM10 Emissions (tpy)
Meyer Dryer	Drying	226,274	51,661	0.2	22.627	0.055	6.223
Berico Dryer	Drying	226,274	51,661	0.2	22.627	0.055	6.223
	<b>TOTAL =</b>				<b>45.255</b>		<b>12.445</b>

**Methodology**

Emission factors are from AP-42 Table 9.9.1-1 Particulate Emission Factors for Uncontrolled Grain Elevators (5th Edition Supplement 1998)

Actual throughput of 23 million bushels in a year were scaled to the maximum of 40 million bushels

Potential Emissions in ton/yr = Processing Rate \* Emission Factor / 2000 (lbs/ton)

Conversion factor of 56 is used to convert bushels to tons of Corn and Bean.

Conversion factor of 60 is used to convert bushels to tons of Wheat and Milo.

AP-42 9.9.1-1 - Country elevators are generally smaller elevators that receive grain by truck directly from farms during harvest season. Terminal elevators dry, clean, blend and store grain other terminals or processors, or for export. These elevators may receive grain by truck, rail, or barge, and generally have greater grain handling and storage capacities than country elevators.

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

**Small Industrial Boiler - Grain Dryer # 1 (S-5)**

**Company Name:** Cargill AgHorizons  
**Address City IN Zip:** Uniontown Road, Mt. Vernon, IN 47620  
**Permit No.:** 129-22803-00001  
**Reviewer:** Surya Ramaswamy/EVP  
**Date:** 1/4/2007

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
36.000	315.4					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	1.20	1.20	0.09	15.77	0.87	13.25

\*PM and PM10 emission factors are combined filterable and condensable PM and PM10 respectively.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**HAPs - Organics**

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.311E-04	1.892E-04	1.183E-02	2.838E-01	5.361E-04

**HAPs - Metals**

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	7.884E-05	1.734E-04	2.208E-04	5.992E-05	3.311E-04

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler - Grain Dryer # 2 (S-6)**

**Company Name:** Cargill AgHorizons  
**Address City IN Zip:** Uniontown Road, Mt. Vernon, IN 47620  
**Permit No.:** 129-22803-00001  
**Reviewer:** Surya Ramaswamy/EVP  
**Date:** 1/4/2007

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
36.000	315.4					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	1.20	1.20	0.09	15.77	0.87	13.25

\*PM and PM10 emission factors are combined filterable and condensable PM and PM10 respectively.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**HAPs - Organics**

Emission Factor in lb/MMcf	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.311E-04	1.892E-04	1.183E-02	2.838E-01	5.361E-04

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	7.884E-05	1.734E-04	2.208E-04	5.992E-05	3.311E-04

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

**Company Name:** Cargill AgHorizons  
**Address City IN Zip:** Uniontown Road, Mt. Vernon, IN 47620  
**Permit No.:** 129-22803-00001  
**Reviewer:** Surya Ramaswamy/EVP  
**Date:** 1/4/2007

Emission Factors: AP-42

According to AP-42, Chapter 13.2.4 - Aggregate Handling and Storage Piles (AP-42, 01/95), the PM/PM10 emissions factors for Aggregate Handling and Storage Piles can be estimated from the following Equation:

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

Where:

Ef	=	Emission factor (lbs/ton)	=	0.74	for PM
k	=	Particle Size Multiplier	=	0.35	for PM10
U	=	Mean wind speed (mph)	=	8	mph
M	=	Moisture Content	=	15	%

PM Emission Factor	=	0.0003	lbs/ton process
PM10 Emission Factor	=	0.0001	lbs/ton process

Potential to Emit PM/PM10 before control

Max. throughput Rate\* = 137,200 tons/year (3 Storage Piles)

PTE of PM (TPY)	=	137,200 ton/yr x 0.0003 lbs/ton x 1 tons/2000 lbs	=	0.0187	tons/year
PTE of PM10 (TPY)	=	137,200 ton/yr x 0.0001 lbs/ton x 1 tons/2000 lbs	=	0.0088	tons/year

Note:

\*0.028 conversion factor is used to convert bushels to tons of grain

Appendix A: Emissions Calculations

**Company Name:** Cargill AgHorizons  
**Address City IN Zip:** Uniontown Road, Mt. Vernon, IN 47620  
**Permit No.:** 129-22803-00001  
**Reviewer:** Surya Ramaswamy/EVP  
**Date:** 1/4/2007

Emission Calculation for:  
 Truck Dump System

	Throughput Mbu/yr	Throughput Tons/yr	AP-42 Table 9.9-1		Uncontrolled		Control Effi. %	Controlled	
			PM lb/tons	PM10 lb/tons	PM tpy	PM10 tpy		PM tpy	PM10 tpy
<b>Receiving</b>									
Hopper Truck: <sup>(a)</sup>	40.00	1120000.00	0.0350	0.0078	19.60	4.37	90.00%	1.96	0.44
<b>Shipping:</b>									
Truck:	0.00	0.00	0.0860	0.0290	0.00	0.00	0.00%	0.00	0.00
<b>Miscellaneous: (Conveyor System and Dry Leg)</b>									
Transfer: <sup>(b)</sup>	124.00	3472000.00	0.0610	0.0340	105.90	59.02	95.00%	5.29	2.95
				<b>Total</b>	<b>125.50</b>	<b>63.39</b>		<b>7.25</b>	<b>3.39</b>

**Note:**

- (a) As a conservative approach, the entire 40 million bushels of grain would be assumed to process through the Hopper Truck dump pit
- (b) It was assumed that the transfer operations would handle 3.1 times the 40 million bushels of grain pursuant to AP 42 guidance.

**Methodology:**

Throughput (Tons/yr) = (Throughput (Mbu/yr) \* 1000000 \* 56)/2000  
 Uncontrolled Emission (TPY) = (Throughput (Tons/yr) \* Emission Factor (lb/tons))/2000  
 Controlled Emission (TPY) = Uncontrolled Emission (TPY) \* (1-Control Efficiency)

**Appendix A: Emissions Calculations**  
**Fugitive Emissions from Paved Roads**

**Company Name:** Cargill AgHorizons  
**Address City IN Zip:** Uniontown Road, Mt. Vernon, IN 47620  
**Permit No.:** 129-22803-00001  
**Reviewer:** Surya Ramaswamy/EVP  
**Date:** 1/4/2007

Emission Factors: AP-42

According to AP-42, Chapter 13.2.1 - Paved Roads (12/3), the PM/PM10 emissions factors for paved roads can be estimated from the following Equation:

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

Where:

E	=	Emission factor (lb/vehicle mile traveled)	=	0.6	(g/m2) (AP-42, Table 13.2.1-3)
sL	=	Road Surface Silt Loading (g/m2)	=	40	tons
w	=	mean vehicle weight with Load (tons)	=	13	tons
w	=	mean vehicle weight without Load (tons)	=	0.082	for PM
k	=	Empirical constant	=	0.016	for PM10
k	=	Empirical constant	=	0.65	
a	=	Empirical constant	=	1.5	
b	=	Empirical constant	=	0.00047	for PM and PM10
C	=	Emission factor for exhaust, brake and tire wear	=	120	
p	=	Number of days per year with 0.01 inches of Precipitation	=		

**Truck With Load**

PM Emission Factor	=	$(0.082 \times 0.6/2)^{0.65} \times (40/3)^{1.5} - 0.00047$	$\times (1 - 120/1460)$	=	3.36	lbs/mile
PM10 Emission Factor	=	$(0.016 \times 0.6/2)^{0.65} \times (40/3)^{1.5} - 0.00047$	$\times (1 - 120/1460)$	=	0.33	lbs/mile

**Truck Without Load**

PM Emission Factor	=	$(0.082 \times 0.6/2)^{0.65} \times (13/3)^{1.5} - 0.00047$	$\times (1 - 120/1460)$	=	0.31	lbs/mile
PM10 Emission Factor	=	$(0.016 \times 0.6/2)^{0.65} \times (13/3)^{1.5} - 0.00047$	$\times (1 - 120/1460)$	=	0.06	lbs/mile

Potential to Emit (PTE) of PM/PM10 Before Control form Paved Roads:

Vehicle type	Ave Weight of Vehicles	Trip Number	Round Trip Distance	Vehicle Mile Traveled	Traffic Component	Component Vehicle Weight	PTE of PM Before Controlled	PTE of PM10 Before Controlled	PTE of PM After Control	PTE of PM10 After Control
	Tons	Trips/year	Mile/Trip	Miles/year	%	Tons	Tons/year	Tons/year	Tons/year	Tons/year
Truck With Load	40	42100	0.545	22944.5	0.5	20	38.57	3.75	19.28	1.87
Truck Without Load	13	42100	0.545	22944.5	0.5	6.5	3.56	0.69	1.78	0.34
<b>Total</b>				<b>45889</b>	<b>1</b>	<b>26.5</b>	<b>42.12</b>	<b>4.44</b>	<b>21.06</b>	<b>2.22</b>

Methodology

Vehicle Miles Traveled (miles/yr) = Trip Number (trip/yr) x Round-trip Distance (mile/trip)  
 Traffic Component (%) = VMT/Total VMT  
 Component Vehicle Weight = Ave. Weight of Vehicle (ton) x Traffic Component (%)  
 PTE of PM/PM10 before Control (tons/yr) = VMT (miles/yr) x PM/PM10 Emissions Factors x 1 ton/2000 lbs