



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: April 5, 2007
RE: ADM Grain Company/153-23403-00002
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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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**ADM Grain Company, Sullivan Elevator
323 North Holloway
Sullivan, Indiana 47882**

(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.

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

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 MSOP under 326 IAC 2-6.1.

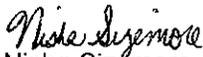
Operation Permit No.: 153-23403-00002	
Issued by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: April 5, 2007 Expiration Date: April 5, 2012

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

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

The Permittee owns and operates a stationary country grain elevator.

Source Address:	323 North Holloway, Sullivan, Indiana 47882
Mailing Address:	1001 North Brush College Road, Decatur, IL 62521
General Source Phone Number:	(217) 424-5817
SIC Code:	5153
County Location:	Sullivan
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) truck receiving operation, identified as EP-1, consisting of the following equipment:
 - (1) One (1) truck receiving pit, identified as North Truck Receiving Pit with a maximum receiving throughput of 250 bushels per hour, a maximum transfer throughput of 4,500 bushels per hour, and constructed in 2004.
 - (2) One (1) truck receiving pit, identified as South Truck Receiving Pit with a maximum receiving throughput of 850 bushels per hour, a maximum transfer throughput of 10,000 bushels per hour, and constructed prior to 1996.
 - (3) One (1) truck receiving pit, identified as East Truck Receiving Pit with a maximum receiving throughput of 400 bushels per hour, a maximum transfer throughput of 3,000 bushels per hour, and constructed prior to 1996.
- (b) One (1) enclosed internal grain handling operation, identified as EP-2, with a maximum throughput of 18,000,000 bushels per year, consisting of the following equipment:
 - (1) One (1) drag conveyor identified as 12 Drag, constructed prior to 1996, with a maximum throughput of 7,500 bushels per hour.
 - (2) One (1) drag conveyor identified as Ground Pile Drag, constructed in 2005, with a maximum throughput of 8,500 bushels per hour.
 - (3) One (1) drag conveyor identified as Transfer Drag, constructed prior to 1996, with a maximum throughput of 5,000 bushels per hour.
 - (4) One (1) drag conveyor identified as Dryer Drag, constructed prior to 1996, with a maximum throughput of 4,000 bushels per hour.

- (5) Four (4) belt conveyors identified as Belts: 12/13, 13/14, 14/15, and 15/16, constructed prior to 1996. The maximum throughput of each conveyor unit is 7,500 bushels per hour.
- (6) Two (2) belt conveyors identified as Belts: 30 and East OH, constructed prior to 1996. The maximum throughput of each conveyor unit is 3,500 bushels per hour.
- (7) One (1) reclaim conveyor identified as 14/15/16 Reclaim, constructed prior to 1996, with a maximum throughput of 17,000 bushels per hour.
- (8) One (1) reclaim conveyor identified as 21 Reclaim, constructed in 1999, with a maximum throughput of 20,000 bushels per hour.
- (9) One (1) reclaim conveyor identified as 6/7/8 Reclaim Drag, constructed prior to 1996, with a maximum throughput of 25,000 bushels per hour.
- (10) One (1) bin fill conveyor, identified as 21 Fill, constructed in 1999, with a maximum throughput of 20,000 bushels per hour.
- (11) One (1) rail high roller constructed in 2005 with a maximum throughput of 35,000 bushels per hour.
- (c) One (1) truck shipping (rail loadout) area, identified as EP-3, with a maximum throughput of 35,000 bushels per hour, constructed in 2005, and equipped with socks/sleeves for particulate control.
- (d) One (1) rail shipping area, identified as EP-4, with a maximum throughput of 35,000 bushels per hour. The shipping area was constructed in 2005 and equipped with a fixed spout to control fugitive dust.
- (e) Sixteen (16) storage bins, each with a vent, consisting of the following bins:
 - (1) One (1) storage bin, identified as bin 6, constructed prior to 1996, with a maximum capacity of 199,579 bushels.
 - (2) One (1) storage bin, identified as bin 7, constructed in 1996, with a maximum capacity of 105,940 bushels.
 - (3) One (1) storage bin, identified as bin 8, constructed prior to 1996, with a maximum capacity of 106,682 bushels.
 - (4) Four (4) storage bins, identified as bins 9, 10, 11, and 12, each constructed prior to 1996, and each with a maximum capacity of 25,223 bushels.
 - (5) One (1) storage bin, identified as bin 13, constructed prior to 1996, with a maximum capacity of 103,709 bushels.
 - (6) One (1) storage bin, identified as bin 14, constructed prior to 1996, with a maximum capacity of 200,434 bushels.
 - (7) Two (2) storage bins, identified as bins 15 and 16, each constructed prior to 1996, and each with a maximum capacity of 200,978 bushels.
 - (8) Two (2) storage bins, identified as bins 17 and 18, each constructed prior to 1996, and each with a maximum capacity of 15,526 bushels.
 - (9) Two (2) storage bins, identified as bins 19 and 20, each constructed prior to 1996, and each with a maximum capacity of 23,795 bushels.

- (10) One (1) storage bin, identified as bin 21, constructed in 1999, with a maximum capacity of 434,834 bushels.
- (f) Haul roads, identified as EP-06, using oil cover for dust suppression.
- (g) One (1) grain dryer, identified as EP-07, constructed prior to 1996, with a maximum heat input capacity of 14 MMBtu per hour, and a maximum throughput of 4,000 bushels per hour.
- (h) One (1) open aggregate pile equipped with a storage ring, constructed in 2005, with a maximum capacity of 488,231 bushels.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

-
- (a) This permit, 153-23403-00002, 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]

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

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

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

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

B.7 Duty to Provide Information

-
- (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 Certification

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

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) 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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 153-23403-00002 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.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

(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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. 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
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least ninety (90) days 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 2-6.1 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.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

**B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]
[IC 13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under 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.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

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

- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

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

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

C.3 Opacity [326 IAC 5-1]

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

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

C.4 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]

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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on 10/10/2006. The plan is included as Attachment A.

C.8 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.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

- (f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by 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.11 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.12 Compliance Monitoring [326 IAC 2-1.1-11]

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

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.14 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.15 Response to Excursions or Exceedances

- (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; and/or
 - (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

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

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

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.17 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.18 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.19 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, 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).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) truck receiving operation, identified as EP-1, consisting of the following equipment:
 - (1) One (1) truck receiving pit, identified as North Truck Receiving Pit with a maximum receiving throughput of 250 bushels per hour, a maximum transfer throughput of 4,500 bushels per hour, and constructed in 2004.
 - (2) One (1) truck receiving pit, identified as South Truck Receiving Pit with a maximum receiving throughput of 850 bushels per hour, a maximum transfer throughput of 10,000 bushels per hour, and constructed prior to 1996.
 - (3) One (1) truck receiving pit, identified as East Truck Receiving Pit with a maximum receiving throughput of 400 bushels per hour, a maximum transfer throughput of 3,000 bushels per hour, and constructed prior to 1996.

- (b) One (1) enclosed internal grain handling operation, identified as EP-2, with a maximum throughput of 15,000,00 bushels per year, consisting of the following equipment:
 - (1) One (1) drag conveyor identified as 12 Drag, constructed prior to 1996, with a maximum throughput of 7,500 bushels per hour.
 - (2) One (1) drag conveyor identified as Ground Pile Drag, constructed in 2005, with a maximum throughput of 8,500 bushels per hour.
 - (3) One (1) drag conveyor identified as Transfer Drag, constructed prior to 1996, with a maximum throughput of 5,000 bushels per hour.
 - (4) One (1) drag conveyor identified as Dryer Drag, constructed prior to 1996, with a maximum throughput of 4,000 bushels per hour.
 - (5) Four (4) belt conveyors identified as Belts: 12/13, 13/14, 14/15, and 15/16, constructed prior to 1996. The maximum throughput of each conveyor unit is 7,500 bushels per hour.
 - (6) Two (2) belt conveyors identified as Belts: 30 and East OH, constructed prior to 1996. The maximum throughput of each conveyor unit is 3,500 bushels per hour.
 - (7) One (1) reclaim conveyor identified as 14/15/16 Reclaim, constructed prior to 1996, with a maximum throughput of 17,000 bushels per hour.
 - (8) One (1) reclaim conveyor identified as 21 Reclaim, constructed in 1999, with a maximum throughput of 20,000 bushels per hour.
 - (9) One (1) reclaim conveyor identified as 6/7/8 Reclaim Drag, constructed prior to 1996, with a maximum throughput of 25,000 bushels per hour.
 - (10) One (1) bin fill conveyor, identified as 21 Fill, constructed in 1999, with a maximum throughput of 20,000 bushels per hour.
 - (11) One (1) rail high roller constructed in 2005 with a maximum throughput of 35,000 bushels per hour.

- (c) One (1) truck shipping (rail loadout) area, identified as EP-3, with a maximum throughput of 35,000 bushels per hour, constructed in 2005, and equipped with socks/sleeves for particulate control.

- (d) One (1) rail shipping area, identified as EP-4, with a maximum throughput of 35,000 bushels per hour. The shipping area was constructed in 2005 and equipped with a fixed spout to control fugitive dust.
- (e) Sixteen (16) storage bins, each with a vent, consisting of the following bins:
- (1) One (1) storage bin, identified as bin 6, constructed prior to 1996, with a maximum capacity of 199,579 bushels.
 - (2) One (1) storage bin, identified as bin 7, constructed in 1996, with a maximum capacity of 105,940 bushels.
 - (3) One (1) storage bin, identified as bin 8, constructed prior to 1996, with a maximum capacity of 106,682 bushels.
 - (4) Four (4) storage bins, identified as bins 9, 10, 11, and 12, each constructed prior to 1996, and each with a maximum capacity of 25,223 bushels.
 - (5) One (1) storage bin, identified as bin 13, constructed prior to 1996, with a maximum capacity of 103,709 bushels.
 - (6) One (1) storage bin, identified as bin 14, constructed prior to 1996, with a maximum capacity of 200,434 bushels.
 - (7) Two (2) storage bins, identified as bins 15 and 16, each constructed prior to 1996, and each with a maximum capacity of 200,978 bushels.
 - (8) Two (2) storage bins, identified as bins 17 and 18, each constructed prior to 1996, and each with a maximum capacity of 15,526 bushels.
 - (9) Two (2) storage bins, identified as bins 19 and 20, each constructed prior to 1996, and each with a maximum capacity of 23,795 bushels.
 - (10) One (1) storage bin, identified as bin 21, constructed in 1999, with a maximum capacity of 434,834 bushels.
- (f) Haul roads, identified as EP-06, using oil cover for dust suppression.
- (g) One (1) grain dryer, identified as EP-07, constructed prior to 1996, with a maximum heat input capacity of 14 MMBtu per hour, and a maximum throughput of 4,000 bushels per hour.
- (h) One (1) open aggregate pile equipped with a storage ring, constructed in 2005, with a maximum capacity of 488,231 bushels.

(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 2-6.1-5(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each process shall be limited by the following:

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

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

P = process weight rate in tons per hour

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 following table shows the maximum process weight rate and allowable particulate emission rate for each emission unit:

Emission Unit	Process Weight Throughput (tons/hr)	Particulate Emission Limit (lbs/hr)
N. Truck Receiving Pit	7.50	15.8
S. Truck Receiving Pit	25.5	35.9
E. Truck Receiving Pit	12.0	21.7
12 Drag	225	59.8
Ground Pile Drag	255	61.2
Transfer Drag	150	55.4
Dryer Drag	120	53.1
12/13 Belt	225	59.8
13/14 Belt	225	59.8
14/15 Belt	225	59.8
15/16 Belt	225	59.8
30 Belt	105	51.8
East OH Belt	105	51.8
14/15/16 Reclaim	270	61.8
21 Reclaim	600	71.2
6/7/8 Reclaim Drag	750	73.9
21 Fill	600	71.2
Rail High Roller	1,050	78.2
Truck Shipping (EP-3)	1,050	78.2
Rail Shipping (EP-4)	1,050	78.2

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

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the truck shipping and rail shipping areas, identified as EP-3 and EP-4, and their control devices.

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the socks and sleeves shall be in operation and control particulate emissions from the the truck and rail shipping areas at all times these facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.4 Monitoring

To monitor the performance of the socks and sleeves, the Permittee shall perform weekly inspections of the socks and sleeves to verify the placement and configuration meet recommendations of the manufacturer. Section C - Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. 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 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirement

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain a log of weekly inspections of the socks and sleeves.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	ADM Grain Company, Sullivan Elevator
Address:	323 North Holloway
City:	Sullivan, Indiana 47882
Phone #:	(217) 424-5817
MSOP #:	153-23403-00002

I hereby certify that ADM Grain Company, Sullivan Elevator is :

still in operation.

I hereby certify that ADM Grain Company, Sullivan Elevator is :

no longer in operation.

in compliance with the requirements of MSOP 153-23403-00002.

not in compliance with the requirements of MSOP 153-23403-00002.

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

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

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-6865

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

ADM

Fugitive Particulate Matter Emission Control Plan

- 1. Name and Address of the source:** ADM
Grain Company - Sullivan 323 North Holloway
Sullivan, IN 47882
- 2. Name and address of the owner or operator responsible for the execution of the control plan.**
Same as above
- 3. Identification of all processes, operation, and areas which have the potential to emit fugitive particulate matter:**
Truck Receiving
Internal Handling
Truck Shipping
Rail Shipping
Storage Bin Vents
Unpaved Roads
Grain Dryer
- 4. A map of the source showing aggregate pile areas, access areas around the aggregate pile, unpaved roads, paved roads, parking lots and location of conveyor and transfer points, etc.**
The aggregate pile, equipped with a storage ring, as well as the other above mentioned items, is noted on the attached map.
- 5. The number and mix of vehicular activity occurring on paved roads, unpaved roads, and parking lots.**
Heavy Duty Diesel Trucks will be delivering and receiving grain at the site. All roads on site are unpaved. There is no parking lot on site. Employees park in an area near the office.
- 6. Type and quantity of material handled.**
This facility is a grain elevator handling approximately 15,000,000 bushels annually.
- 7. Equipment used to maintain aggregate piles.**
The aggregate pile is equipped with a storage ring that is filled once per year with grain. The grain is placed in the ring using a fill conveyor and removed from the ring using an end loader. Trucks transferring material to the pile will be covered. When the pile has reached maximum capacity it will be covered with a tarp. The pile will remain covered until the material is transferred out of storage.
- 8. A description of the measures to be implemented to control fugitive particulate matter emissions resulting from emission points identified in section 3.**
The facility has implemented several measures to control fugitive dust at the facility. The truck receiving areas are partially enclosed. The internal handling system is enclosed. The truck/rail shipping utilizes sleeves that extend into the container.
- 9. A specification of the dust suppressant material, such as oil or chemical including estimated frequency of application rates and concentrations.**
An oil and sand pack will be applied on an as needed to the unpaved roadways.
- 10. A specification of the particulate matter collection equipment used as a fugitive particulate matter emission control measure.**
The facility does not utilize any fugitive particulate matter collection equipment.

11. A schedule of compliance with the provisions of the control plan. Such schedule shall specify the amount of time the source requires to award any necessary contracts, commence and complete construction, installation, or modification of the fugitive particulate matter emission control measures. The facility changes sleeves on the loadout and oils the unpaved roads on an as needed basis. Typically once a problem is noticed it can be resolved within the week.

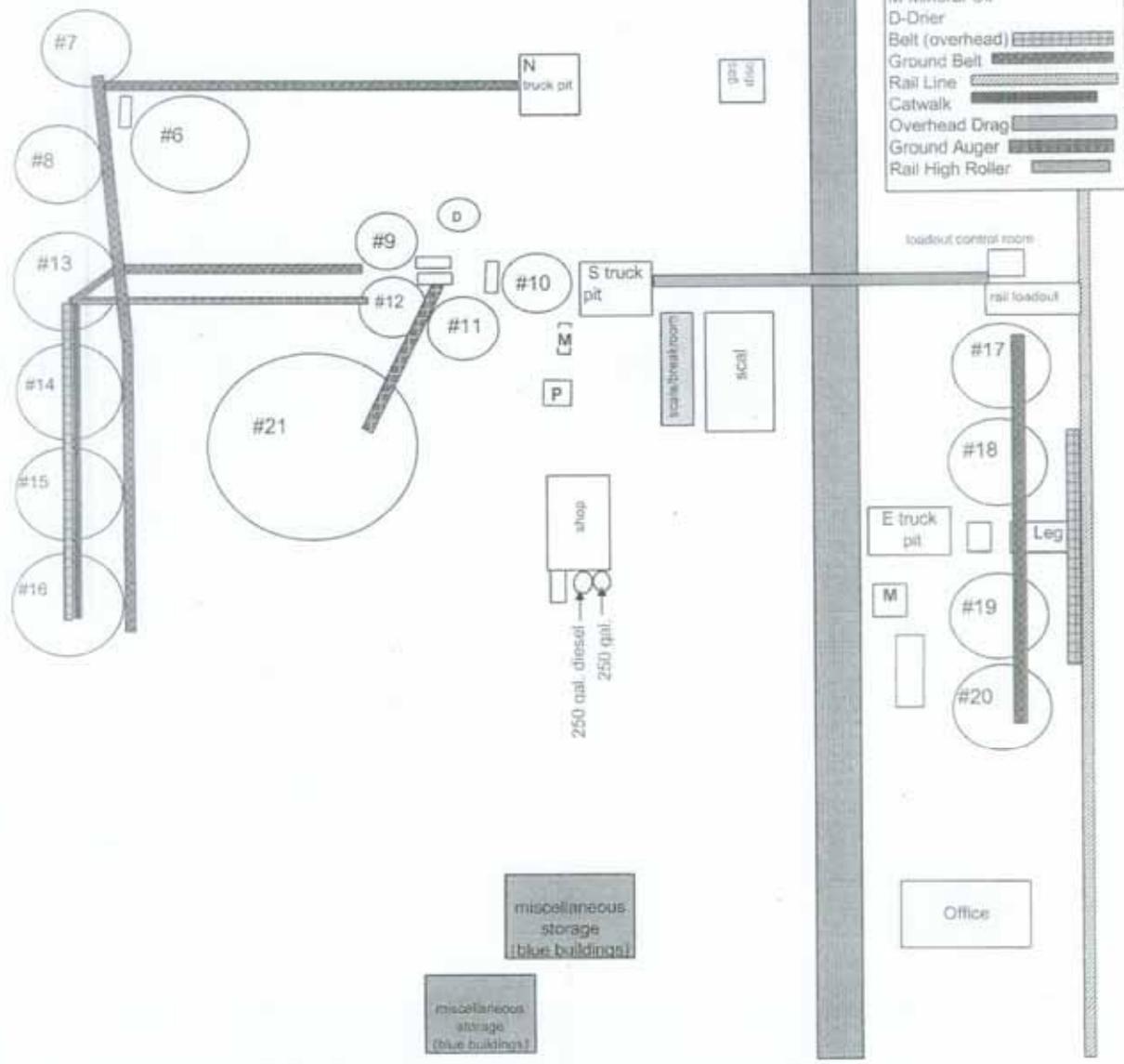
12. Other relevant data.
No other data.

Plant Layout Diagram

ADM Grain Company
Sullivan, IN
ID No: 153-00002



KEY	
P-power room	
M-Mineral Oil	
D-Drier	
Belt (overhead)	
Ground Belt	
Rail Line	
Catwalk	
Overhead Drag	
Ground Auger	
Rail High Roller	



Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	ADM Grain Company, Sullivan Elevator
Source Location:	323 North Holloway Sullivan, Indiana 47882
County:	Sullivan
SIC Code:	5153
Operation Permit No.:	153-21757-00002
Operation Permit Issuance Date:	September 27, 2005
Permit Renewal No.:	153-23403-00002
Permit Reviewer:	ERG/BL

The Office of Air Quality (OAQ) has reviewed an application from ADM Grain Company, Sullivan Elevator relating to the operation of a country grain elevator.

History

This country grain elevator has been operating under the provisions of Permit By Rule PBR 153-21757-00002 issued September 27, 2005. Over the last few years, the number of customers and the harvest yields in the immediate vicinity have increased. As a result, this source is receiving more grain and anticipates their throughput of grain will exceed the annual total throughput limit of 11.2 million bushels under PBR 153-21757-00002. Therefore, this source is now being permitted under the provisions of 326 IAC 2-6.1 (Minor Source Operating Permit).

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) truck receiving operation, identified as EP-1, consisting of the following equipment:
 - (1) One (1) truck receiving pit, identified as North Truck Receiving Pit with a maximum receiving throughput of 250 bushels per hour, a maximum transfer throughput of 4,500 bushels per hour, and constructed in 2004.
 - (2) One (1) truck receiving pit, identified as South Truck Receiving Pit with a maximum receiving throughput of 850 bushels per hour, a maximum transfer throughput of 10,000 bushels per hour, and constructed prior to 1996.
 - (3) One (1) truck receiving pit, identified as East Truck Receiving Pit with a maximum receiving throughput of 400 bushels per hour, a maximum transfer throughput of 3,000 bushels per hour, and constructed prior to 1996.
- (b) One (1) enclosed internal grain handling operation, identified as EP-2, with a maximum throughput of 18,000,000 bushels per year, consisting of the following equipment:
 - (1) One (1) drag conveyor identified as 12 Drag, constructed prior to 1996, with a maximum throughput of 7,500 bushels per hour.

- (2) One (1) drag conveyor identified as Ground Pile Drag, constructed in 2005, with a maximum throughput of 8,500 bushels per hour.
 - (3) One (1) drag conveyor identified as Transfer Drag, constructed prior to 1996, with a maximum throughput of 5,000 bushels per hour.
 - (4) One (1) drag conveyor identified as Dryer Drag, constructed prior to 1996, with a maximum throughput of 4,000 bushels per hour.
 - (5) Four (4) belt conveyors identified as Belts: 12/13, 13/14, 14/15, and 15/16, constructed prior to 1996. The maximum throughput of each conveyor unit is 7,500 bushels per hour.
 - (6) Two (2) belt conveyors identified as Belts: 30 and East OH, constructed prior to 1996. The maximum throughput of each conveyor unit is 3,500 bushels per hour.
 - (7) One (1) reclaim conveyor identified as 14/15/16 Reclaim, constructed prior to 1996, with a maximum throughput of 17,000 bushels per hour.
 - (8) One (1) reclaim conveyor identified as 21 Reclaim, constructed in 1999, with a maximum throughput of 20,000 bushels per hour.
 - (9) One (1) reclaim conveyor identified as 6/7/8 Reclaim Drag, constructed prior to 1996, with a maximum throughput of 25,000 bushels per hour.
 - (10) One (1) bin fill conveyor, identified as 21 Fill, constructed in 1999, with a maximum throughput of 20,000 bushels per hour.
 - (11) One (1) rail high roller constructed in 2005 with a maximum throughput of 35,000 bushels per hour.
- (c) One (1) truck shipping (rail loadout) area, identified as EP-3, with a maximum throughput of 35,000 bushels per hour, constructed in 2005, and equipped with socks/sleeves for particulate control.
- (d) One (1) rail shipping area, identified as EP-4, with a maximum throughput of 35,000 bushels per hour. The shipping area was constructed in 2005 and equipped with a fixed spout to control fugitive dust.
- (e) Sixteen (16) storage bins, each with a vent, consisting of the following bins:
- (1) One (1) storage bin, identified as bin 6, constructed prior to 1996, with a maximum capacity of 199,579 bushels.
 - (2) One (1) storage bin, identified as bin 7, constructed in 1996, with a maximum capacity of 105,940 bushels.
 - (3) One (1) storage bin, identified as bin 8, constructed prior to 1996, with a maximum capacity of 106,682 bushels.
 - (4) Four (4) storage bins, identified as bins 9, 10, 11, and 12, each constructed prior to 1996, and each with a maximum capacity of 25,223 bushels.
 - (5) One (1) storage bin, identified as bin 13, constructed prior to 1996, with a maximum capacity of 103,709 bushels.
 - (6) One (1) storage bin, identified as bin 14, constructed prior to 1996, with a maximum capacity of 200,434 bushels.

- (7) Two (2) storage bins, identified as bins 15 and 16, each constructed prior to 1996, and each with a maximum capacity of 200,978 bushels.
- (8) Two (2) storage bins, identified as bins 17 and 18, each constructed prior to 1996, and each with a maximum capacity of 15,526 bushels.
- (9) Two (2) storage bins, identified as bins 19 and 20, each constructed prior to 1996, and each with a maximum capacity of 23,795 bushels.
- (10) One (1) storage bin, identified as bin 21, constructed in 1999, with a maximum capacity of 434,834 bushels.
- (f) Haul roads, identified as EP-06. The permittee uses oil cover for dust suppression.
- (g) One (1) grain dryer, identified as EP-07, constructed prior to 1996, with a maximum heat input capacity of 14 MMBtu per hour, and a maximum throughput of 4,000 bushels per hour.
- (h) One (1) open aggregate pile equipped with a storage ring, constructed in 2005, with a maximum capacity of 488,231 bushels.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Existing Approvals

The source has been constructed and operated under the following:

- (a) Permit By Rule PBR 153-16722-00002 issued on February 28, 2003, and
- (b) Permit By Rule PBR 153-21757-00002 issued on September 27, 2005

None of the provisions of PBR 153-21757-00002 are included in this MSOP. The source no longer will be limited to a total annual grain throughput of less than 11.2 million bushels. The requirements of 326 IAC 2-11 (Permit By Rule) will no longer be applicable to this source after issuance of this MSOP.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

There are no process stacks associated with any facilities at this source.

Recommendation

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

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

An application for the purposes of this review was received on July 21, 2006, with additional information received on October 6, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations in Appendix A, pages 1 through 5.

Potential to Emit (of the Source or Revision) Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	157
PM-10	50.3
SO ₂	0.04
VOC	0.33
CO	5.05
NO _x	6.01

HAPs	Potential to Emit (tons/yr)
Total	0.11

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than one hundred (100) tons per year and the potential to emit of PM and PM-10 is greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

County Attainment Status

The source is located in Sullivan County.

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

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (a) Sullivan 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 Entire Source section.

- (b) Volatile organic compounds (VOC) emissions and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Sullivan County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability Entire Source section.
- (c) Sullivan County has been classified as attainment or unclassifiable in Indiana for PM, PM10, NO₂, SO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability Entire Source section.
- (d) Fugitive Emissions
Fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD and Emission Offset applicability because the source is included in the regulated category of Grain Elevators. The requirements of the NSPS for Grain Elevators are not included in this permit, but the Subpart was promulgated August 3, 1978.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on U.S. EPA's AP-42 Fifth Edition, Volume I, Chapter 9.9.1 "Grain Elevators & Processes," May, 2003):

Pollutant	Emissions (tons/yr)
PM	75.8
PM-10	23.9
SO ₂	0.04
VOC	0.33
CO	5.05
NO _x	6.01
Single HAP	Negligible
Combination HAPs	0.11

- (a) This existing source is not a major stationary under PSD 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 were based on the calculations contained in Appendix A of this document.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit M153-23403-00002, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source and the calculations provided in Appendix A.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.300, Subpart DD are not included in this permit because the source has a permanent storage capacity less than 2.5 million U.S. bushels. The maximum storage capacity of the source is 2.2 million U.S. bushels.
- (b) There are no New Source Performance Standards (326 IAC 12) included in this permit.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.

State Rule Applicability – Entire Source

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

This source is not one of the twenty-eight (28) listed source categories, and the potential to emit (PTE) of all criteria pollutants is less than two hundred fifty (250) tons per year. Therefore, this source is a minor source and 326 IAC 2-2 (PSD) does not apply.

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

The operation of this grain elevator emits less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Sullivan County, is not required to operate under a Part 70 permit, and emits less than five (5) tons per year of lead. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided in 326 IAC 2-6-5.

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 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).

326 IAC 6-5-1 (Fugitive Particulate Matter Emission Limitations)

This source is subject to this rule because it is a new source of particulate matter (PM) which did receive all necessary preconstruction approvals before December 13, 1985, it is located in Sullivan county, and it requires a permit as set forth in 326 IAC 2.

This rule requires a fugitive dust plan to be submitted. The plan, was received on October 10, 2006. The source shall comply with all dust abatement measures contained therein, which include, applying oil and sand pack to unpaved roadways and changing sleeves attached to loadout grain spouts.

Records shall be kept and maintained to document all control measures and activities to be implemented in accordance with the control plan. Records shall be available upon the request of the commissioner, and shall be retained for three (3) years.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each process shall be limited by the following:

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

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

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

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

The following table sets forth the maximum process weight rate for specific emission units and the allowable rate of emissions calculated for that process weight rate. The Grain processed is estimated to weigh 60 pounds per bushel.

Emission Unit	Process Weight Throughput (tons/hr)	Particulate Emission Limit (lbs/hr)	Control Description	Calculated Emissions (lbs/hr)
N. Truck Receiving Pit	7.50	15.8	Uncontrolled	1.35
S. Truck Receiving Pit	25.5	35.9	Uncontrolled	4.59
E. Truck Receiving Pit	12.0	21.7	Uncontrolled	2.16
12 Drag	225	59.8	Enclosed	1.37
Ground Pile Drag	255	61.2	Enclosed	1.56
Transfer Drag	150	55.4	Enclosed	0.92
Dryer Drag	120	53.1	Enclosed	0.73
12/13 Belt	225	59.8	Enclosed	1.37
13/14 Belt	225	59.8	Enclosed	1.37
14/15 Belt	225	59.8	Enclosed	1.37
15/16 Belt	225	59.8	Enclosed	1.37
30 Belt	105	51.8	Enclosed	0.64
East OH Belt	105	51.8	Enclosed	0.64
14/15/16 Reclaim	270	61.8	Enclosed	1.65
21 Reclaim	600	71.2	Enclosed	3.66
6/7/8 Reclaim Drag	750	73.9	Enclosed	4.58
21 Fill	600	71.2	Enclosed	3.66
Rail High Roller	1,050	78.2	Enclosed	6.41
Truck Shipping (EP-3)	1,050	78.2	Spouts/Sleeves	18.1
Rail Shipping (EP-4)	1,050	78.2	Spouts/Sleeves	18.1

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

Emission calculations based on AP-42 factors indicate that each emission unit is able to comply with the limits provided in the table above. Only the truck and rail shipping areas need a control device in order to comply. The shipping area operations need only a 14% control efficiency to

comply with these limits. The source will use socks and sleeves to comply with the 326 IAC 6-3 limits.

Compliance Requirements

Compliance monitoring is required for the truck and rail shipping areas, identified as EP-3 and EP-4, in order to ensure that the socks and sleeves for particulate control are operating properly at all times. The Permittee shall perform weekly inspections to verify the placement and configuration of the socks and sleeves used to control particulate emissions at the truck shipping (EP-3) and rail shipping (EP-4) facilities. Section C - Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The socks/sleeves must operate properly in order for the shipping areas to comply with 326 IAC 6-3-2.

Conclusion

The operation of this country grain elevator shall be subject to the conditions of the Minor Source Operating Permit M153-23403-00002.

Appendix A: Emission Calculations

Company Name: ADM Grain Company, Sullivan Elevator
Address: 3232 North Holloway Sullivan, IN 47882
FESOP: 153-23403-00002
Reviewer: ERG/BL
Date: September 29, 2006

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NOx	HAPs
Receiving	38.0	12.2	-	-	-	-	-
Rail and Truck Shipping	23.2	7.83	-	-	-	-	-
Internal Handling	16.5	9.18	-	-	-	-	-
Storage Bins	6.75	1.70	-	-	-	-	-
Column Dryer	59.4	14.9	-	-	-	-	-
Column Dryer, combustion	0.11	0.46	0.04	0.33	5.05	6.01	0.11
Unpaved Roads	11.6	3.54	-	-	-	-	-
Gound Pile	1.13	0.53	-	-	-	-	-
TOTAL =	157	50.3	0.04	0.33	5.05	6.01	0.11

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NOx	HAPs
Receiving	38.0	12.2	-	-	-	-	-
Rail and Truck Shipping	4.64	1.57	-	-	-	-	-
Internal Handling	1.65	0.92	-	-	-	-	-
Storage Bins	6.75	1.70	-	-	-	-	-
Column Dryer	11.9	2.97	-	-	-	-	-
Column Dryer, combustion	0.11	0.46	0.04	0.33	5.05	6.01	0.11
Unpaved Roads	11.6	3.54	-	-	-	-	-
Gound Pile	1.13	0.53	-	-	-	-	-
TOTAL =	75.8	23.9	0.04	0.33	5.05	6.01	0.11

Appendix A: Emission Calculations
PM and PM10 Emissions From the Grain Handling, Storage and Drying Processes

Company Name: ADM Grain Company, Sullivan Elevator
Address: 3232 North Holloway Sullivan, IN 47882
FESOP: 153-23403-00002
Reviewer: ERG/BL
Date: September 29, 2006

1. Maximum Throughput Calculation

This source has requested had an increase in their throughput of grain and defined the annual maximum throughput as 450,000 tons per year. IDEM multiplied the requested throughput by an adjustment factor 1.2 to constitute a realistic upper bound on the amount of grain this country elevator could receive (540,000 tons per year).

Year	Grain Received	
	(bushels/yr)	(tons/yr)
2001	10,315,652	309,470
2002	8,622,180	258,665
2003	8,754,504	262,635
2004	9,101,867	273,056
2005	10,060,763	301,823

2. PTE Calculations

Emissions Unit Description	Maximum Grain Throughput (tons/yr)	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	Control Device(s)	Collection and Control Efficiency (%)	PTE of PM Before Control (tons/yr)	PTE of PM10 Before Control (tons/yr)	PTE of PM After Control (tons/yr)	PTE of PM10 After Control (tons/yr)
Receiving - Straight Truck *	394,200	0.18	0.059	NA	0%	35.5	11.6	35.5	11.6
Receiving - Hopper Truck	145,800	0.035	0.0078	NA	0%	2.55	0.57	2.55	0.57
Shipping - Truck *	540,000	0.086	0.029	Spouts/sleeves	80%	23.2	7.83	4.64	1.57
Shipping - Railcar	0	0.027	0.0022	Spouts/sleeves	80%	0.00	0.00	0.00	0.00
Internal Handling	540,000	0.061	0.034	Enclosed	90%	16.5	9.18	1.65	0.92
Storage - Silos and Bins	540,000	0.025	0.0063	NA	0%	6.75	1.70	6.75	1.70
Drying - Column Dryer**	540,000	0.22	0.055	Perforation Plate	80%	59.4	14.9	11.9	2.97
Totals						144	45.8	63.0	19.4

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (4/03)

* Receiving and shipping by truck produces more particulate emissions than receiving and shipping by railcar. To constitute a realistic maximum particulate emissions IDEM has assumed a maximum amount of shipping and receiving is handled by truck with the balance handled by railcar.

**In 2005, the source dried nine percent (9%) of received grain. For the potential to emit, IDEM has assumed all received grain is dried.

Methodology

Maximum Grain Throughput (tons/yr) = Adjustment Factor (1.2) x Requested Throughput (450,000 tons/yr)

Maximum Receiving - Straight Truck (tons/yr) = Maximum Throughput Truck Receiving Pits (bushels/hr) x 60 (lbs/bushel) x 1 ton/2000 lbs x 8760 hrs/yr

PTE of PM/PM10 Before Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs

PTE of PM/PM10 After Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs x (1- Control Efficiency (%))

Appendix A: Emission Calculations
PM Emissions From the Grain Handling, Storage and Drying Processes
Demonstration of Compliance with 326 IAC 6-3-2

Company Name: ADM Grain Company, Sullivan Elevator
Address: 3232 North Holloway Sullivan, IN 47882
FESOP: 153-23403-00002
Reviewer: ERG/BL
Date: September 29, 2006

Allowable Emissions Under 326 IAC 6-3-2

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (tons/hr)	PM Emission Factor (lbs/ton)	Control Device(s)	Collection and Control Efficiency (%)	PM Emissions Before Control (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)	PM Emissions After Control (lbs/hr)
North Truck Receiving Pit	250	7.50	0.18	NA	0%	1.35	15.8	1.35
South Truck Receiving Pit	850	25.5	0.18	NA	0%	4.59	35.9	4.59
East Truck Receiving Pit	400	12.0	0.18	NA	0%	2.16	21.7	2.16
12 Drag	7,500	225	0.061	Enclosed	90%	13.7	59.8	1.37
Ground Pile Drag	8,500	255	0.061	Enclosed	90%	15.6	61.2	1.56
Transfer Drag	5,000	150	0.061	Enclosed	90%	9.15	55.4	0.92
Dryer Drag	4,000	120	0.061	Enclosed	90%	7.32	53.1	0.73
12/13 Belt	7,500	225	0.061	Enclosed	90%	13.7	59.8	1.37
13/14 Belt	7,500	225	0.061	Enclosed	90%	13.7	59.8	1.37
14/15 Belt	7,500	225	0.061	Enclosed	90%	13.7	59.8	1.37
15/16 Belt	7,500	225	0.061	Enclosed	90%	13.7	59.8	1.37
30 Belt	3,500	105	0.061	Enclosed	90%	6.41	51.8	0.64
East OH Belt	3,500	105	0.061	Enclosed	90%	6.41	51.8	0.64
14/15/16 Reclaim	9,000	270	0.061	Enclosed	90%	16.5	61.8	1.65
21 Reclaim	20,000	600	0.061	Enclosed	90%	36.6	71.2	3.66
6/7/8 Reclaim Drag	25,000	750	0.061	Enclosed	90%	45.8	73.9	4.58
21 Fill	20,000	600	0.061	Enclosed	90%	36.6	71.2	3.66
Rail High Roller	35,000	1,050	0.061	Enclosed	90%	64.1	78.2	6.41
Truck Shipping (EP-3)	35,000	1,050	0.086	Spouts/sleeves	80%	90.3	78.2	18.1
Rail Shipping (EP-4)	35,000	1,050	0.086	Spouts/sleeves	80%	90.3	78.2	18.1

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67}$$

where

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

Where the process weight rate is in excess of sixty thousand (60,000) pounds per hour calculate the allowable emissions using 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

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (4/03)

Methodology

Maximum Grain Throughput (tons/hr) = Maximum Grain Throughput (bushels/hr) x 60 (lbs/bushel) x 1 ton/2000 lbs

PTE of PM/PM10 Before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton)

PTE of PM/PM10 After Control (tons/yr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton) x (1- Control Efficiency (%))

**Appendix A: Emission Calculations
Grain Drying - Natural Gas Combustion**

Company Name: ADM Grain Company, Sullivan Elevator
Address: 3232 North Holloway Sullivan, IN 47882
FESOP: 153-23403-00002
Reviewer: ERG/BL
Date: September 29, 2006

Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)
14.0	120

Emission Factor (lb/MMCF)	Pollutant						
	PM*	PM10*	SO ₂	NO _x **	VOC	CO	HAPs
Emission Factor (lb/MMCF)	1.90	7.60	0.60	100	5.50	84.0	1.89
Potential to Emit (tons/yr)	0.11	0.46	0.04	6.01	0.33	5.05	0.11

*PM10 emission factor is for condensable and filterable PM combined. PM emission factor is for filterable PM only.

**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF.

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

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

Methodology

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 (hrs/yr) x 1 MMCF/1,020 MMBtu

PTE (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 1 ton/2000 lbs

**Appendix A: Emission Calculations
PM and PM10 Emissions from Vehicle Traffic
On Unpaved Roads**

Company Name: ADM Grain Company, Sullivan Elevator
Address: 3232 North Holloway Sullivan, IN 47882
FESOP: 153-23403-00002
Reviewer: ERG/BL
Date: September 29, 2006

Truck Traffic

Trips (trips/hour)	1.9
Lenth of Trip, One Direction (miles)	0.2
Potential Operation (hrs/yr)	8,760

Vehicle Miles Traveled (miles/yr)	PM Emission Factor (lbs/mile)	PTE PM Emissions (tons/yr)	PM10 Emission Factor (lbs/mile)	PTE PM10 Emissions (tons/yr)
6,658	3.48	11.6	1.06	3.54

Emission factors are from AP 42 Section 13.2.2 Unpaved Roads, Final Section - December 2003
 Industrial roads equation with the effect of routine watering incorporated.

Methodology

Vehicle Miles Traveled (miles/yr) = Trips (trips/hour) * Lenth of Trip, One Way (miles) * 2 * Potential Operation (hrs/yr)
 Potential to Emit (tons/yr) = Vehicle Miles Traveled (miles/yr) * Particulate Emission Factor (lbs/mile) * 1 ton / 2,000 lbs

$$E = k * (s/12)^a * W/3^b * (365-p)/365$$

Where:

- E = size-specific emission factor (lb/VMT)
- k (lb/VMT) = 1.5 industrial roads constants for PM-10
4.9 industrial roads constants for PM
- s = 4.8 surface material silt content (%) [from Table 13.2.2-1. Sand and gravel processing]
- a = 1 industrial roads constants
- W = 26 mean vehicle weight (tons)
- b = 0.45 industrial roads constants
- P = 120 number of days in a year with at least 0.254 mm (0.01 in) of precipitation

**Appendix A: Emission Calculations
PM and PM10 Emissions from Gound Pile**

Company Name: ADM Grain Company, Sullivan Elevator
Address: 3232 North Holloway Sullivan, IN 47882
FESOP: 153-23403-00002
Reviewer: ERG/BL
Date: September 29, 2006

Material Transferred (tons/yr)	PM Emission Factor (lbs/ton)	PTE PM Emissions (tons/yr)	PM10 Emission Factor (lbs/ton)	PTE PM10 Emissions (tons/yr)
540,000	4.17E-03	1.13	1.97E-03	0.53

Emission factors are from AP 42 Section 13.2.4 Aggregate Handling And Storage Piles - November 2006.
 Source moisture was from Table 13.2.4-1 - Stone quarrying and processing.

Methodology

Potential to Emit (tons/yr) = Material Transferred (tons/yr) * Particulate Emission Factor (lbs/ton) * 1 ton / 2,000 lbs

$$E = k (0.0032) * ((U/5)^{1.3}) / ((M/2)^{1.4})$$

Where:

- E = emission factor (lb particulate per ton of material transferred)
- k = 0.35 particle size multiplier (dimensionless) for PM-10
- 0.74 particle size multiplier (dimensionless) for PM
- U = 8.15 mean wind speed, meters per second (m/s) (miles per hour [mph])
- M = 2.1 material moisture content (%)