



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: February 20, 2007  
RE: Monsanto Company / 073-23632-00035  
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



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

## New Source Review and A Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Monsanto Company  
15489 South US Highway 231  
Remington, Indiana 47977**

(herein known as the Permittee) is hereby authorized to construct and 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 2-8as 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.: F 073-23632-00035	
Issued by: Original Signed By:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: February 20, 2007  Expiration Date: February 20, 2012

## TABLE OF CONTENTS

<b>SECTION A</b>	<b>SOURCE SUMMARY</b> .....	5
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
<b>SECTION B</b>	<b>GENERAL CONDITIONS</b> .....	8
B.1	Definitions [326 IAC 2-8-1]	
B.2	Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3	Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4] [326 IAC 2-8]	
B.4	Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]	
B.5	Term of Conditions [326 IAC 2-1.1-9.5]	
B.6	Enforceability [326 IAC 2-8-6]	
B.7	Severability [326 IAC 2-8-4(4)]	
B.8	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.9	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.10	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.11	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.13	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.14	Emergency Provisions [326 IAC 2-8-12]	
B.15	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.16	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	
B.17	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.18	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]	
B.19	Permit Renewal [326 IAC 2-8-3(h)]	
B.20	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	
B.21	Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]	
B.22	Source Modification Requirement [326 IAC 2-8-11.1] [326 IAC 2-2-2] [326 IAC 2-3-2]	
B.23	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]	
B.24	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.25	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]	
B.26	Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]	
B.27	Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS</b> .....	18
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.9	Performance Testing [326 IAC 3-6]	

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

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

**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)]

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

**SECTION D.1 FACILITY OPERATION CONDITIONS: Corn Processing Facilities ..... 24**

**Construction Conditions**

**General Construction Conditions**

D.1.1 Permit No Defense

D.1.2 Effective Date of the Permit [IC13-15-5-3]

D.1.3 Modification to Construction Conditions [326 IAC 2]

**Operation Conditions**

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

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]

D.1.5 Particulate Matter (PM) [326 IAC 2-2]

D.1.6 Particulate Matter (PM<sub>10</sub>) [326 IAC 2-8-4]

D.1.7 Natural Gas Limit [326 IAC 2-8-4]

D.1.8 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

D.1.9 Preventive Maintenance Plan [326 IAC 1-6-3]

**Compliance Determination Requirements**

D.1.10 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

D.1.11 Particulate Control

**Compliance Monitoring Requirements**

D.1.12 Visible Emissions Notations

D.1.13 Baghouse Parametric Monitoring

D.1.14 Broken or Failed Bag Detection

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

D.1.15 Record Keeping Requirements

D.1.16 Reporting Requirements

<b>Certification Form</b> .....	35
<b>Emergency Occurrence Form</b> .....	36
<b>Quarterly Report Form</b> .....	38
<b>Quarterly Deviation and Compliance Monitoring Report Form</b> .....	51

## 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)]

---

The Permittee owns and operates a hybrid corn seed processing plant.

Source Address:	15489 South US Highway 231, Remington, Indiana 47977
Mailing Address:	P.O. Box 35, Remington, Indiana 47977
General Source Phone Number:	(219) 261-2122
SIC Code:	0723
County Location:	Jasper
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source under PSD Rules Minor Source under Section 112 of the Clean Air Act

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

---

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

- (a) Two (2) receiving lines, identified as Corn Receiving #1 and Corn Receiving #2, consisting of two (2) huskers, identified as Husker 1 and Husker 2, which each consist of five (5) husking beds, installed in 1976, and modified in 1995 and 2007, exhausting to general ventilation, capacity: 1,000 bushels (56,000 pounds) of ear corn per hour for each line and each husker.
- (b) Two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B, exhausting to Stacks Dry 2A and Dry 2B, installed in 1976, heat input capacity: sixty (60) million British thermal units per hour, each, and a dry rate of 20,238 bushels per batch {500 bushels (28,000 pounds) per hour, each}.
- (c) One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12, installed in 1994 and modified in 2005, equipped with a baghouse for particulate control, identified as Red Dust Collector, capacity: 134,400 pounds of seed corn per hour, total.
- (d) One (1) treater, identified as Treater #3, installed in 1994 and modified in 2005, equipped with a baghouse for particulate control, identified as Red Dust Collector, capacity: 500 bushels (28,000 pounds) of shelled corn per hour.
- (e) One (1) rebagging unit, identified as #13, installed in 1992 and modified in 2005, with a capacity of 114,800 pounds per hour, equipped with a baghouse for particulate control, identified as Red Dust Collector, capacity: 114,800 pounds of seed corn per hour.
- (f) One (1) seed corn debagger, identified as EU34, installed in 2002, exhausting to a baghouse, identified as Red Dust Collector, maximum throughput: 1,000 bushels (56,000 pounds) of seed corn per hour.

- (g) Thirty-seven (37) bulk storage bins, identified as B-1 through B-17 and B-21 through B-40, installed in 1999, throughput: 1,000 bushels (56,000 pounds) of shelled corn per hour. Storage bins B-1 through B-4 have a capacity of 11,000 bushels (770,000 pounds) each; storage bins B-5 through B-8 have a capacity of 15,000 bushels (1,050,000 pounds) each; storage bins B-9 through B-12 have a capacity of 11,000 bushels (770,000 pounds) each; storage bins B-13 through B-17 have a capacity of 4,600 bushels (322,000 pounds) each; storage bins B-21 through B-30 have a capacity of 5,000 bushels (350,000 pounds) each; and storage bins B-31 through B-40 have a capacity of 7,500 bushels (525,000 pounds) each.
- (h) One (1) small lot bagging operation, installed in 2005, consisting of the CBT-100 treater, identified as EU102, an aspirator, identified as EU103, and bagging unit #2, identified as EU104, exhausting to a baghouse, identified as CE14, capacity: 3,550 bushels (198,800 pounds) per hour, total.
- (i) One (1) natural gas-fired bin dryer, identified as Dry 3, approved for construction in 2007, exhausting to Stack Dry 3, with a drying rate of 500 bushels (28,000 pounds) per hour and a heat input capacity of 160 million British thermal units per hour, equipped with eighteen (18) storage bins, identified as Dry 3 Bins, used for drying with a capacity of 2,000 bushels (152,000 pounds), each.
- (j) One (1) corn sheller, identified as Sheller, approved for construction in 2007, exhausting to a baghouse for particulate control, identified as CE 15, capacity: 2,000 bushels (112,000 pounds) of corn per hour.
- (k) Two (2) corn handling lines, identified as Line 1 and Line 2, consisting of the following:
  - (1) Thirty-two (32) bulk storage bins, identified as B-41 through B-72, approved for construction in 2007, exhausting to a baghouse for particulate control, identified as CE 34, throughput: 1,000 bushels (56,000 pounds) of shelled corn per hour. Storage bins B-41 through B-56 have a capacity of 7,500 bushels (420,000 pounds), each, and storage bins B-57 through B-72 have a capacity of 5,000 bushels (280,000 pounds), each.
  - (2) Two (2) cleaners, identified as Cleaner Line 1 and Cleaner Line 2, approved for construction in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector #1 and White Dust Collector #2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.
  - (3) Two (2) sorters, identified as Sorter Line 1 and Sorter Line 2, approved for construction in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector #1 and White Dust Collector #2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.
  - (4) Two (2) sizers, identified as Sizer Line 1 and Sizer Line 2, approved for construction in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector #1 and White Dust Collector #2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.
  - (5) Sixteen (16) gravity tables, identified as Gravity Tables Line 1 and Gravity Tables Line 2, approved for construction in 2007, equipped with sixteen (16) dust collectors for particulate control, identified as Gravity Table Dust Collectors #1 through #16, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (6) Twenty-four (24) storage bins, identified as Storage Bins Lines 1 and Storage Bins

Line 2, approved for construction in 2007, throughput capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.

- (l) New treating/packing machinery, consisting of the following:
  - (1) Three (3) aspirators, identified as Aspirator #1 through #3, approved for construction in 2007, exhausting to a baghouse, identified as Red Dust Collector, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (2) Two (2) treaters, identified as Treater #1 and #2, approved for construction in 2007, exhausting to a baghouse, identified as Red Dust Collector, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (3) Twelve (12) storage bins, identified as Treating and Packing Storage Bins 1 through 12, approved for construction in 2007, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (4) One (1) debagger, identified as EU106, exhausting to a baghouse, identified as CE14, approved for construction in 2007, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour.

Calculations indicate that the three (3) baghouses, identified as the Red Dust Collector, CE 15, and CE 34, do not have to be operated in order for the associated emission units to comply with applicable rules.

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

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 million (10,000,000) Btu per hour, with no boilers.
- (b) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to one thousand (1,000) and annual throughputs less than twelve thousand (12,000) gallons.
  - (2) Vessels storage the following: hydraulic oils, lubricating oils, machining oils, and machining fluids.
- (c) Paved and unpaved roads and parking lots with public access.

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) for a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

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

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

### **B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]**

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4] [326 IAC 2-8]**

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

- (a) This permit, 073-23632-00035, 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 13-15-3-3. 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.5 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.6 Enforceability [326 IAC 2-8-6]**

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

**B.7 Severability [326 IAC 2-8-4(4)]**

---

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

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

---

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

---

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by 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.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

---

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

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

---

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, 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.12 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.13 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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

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

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

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

- (b) 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.14 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 state 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  
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.
- (h) 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.15** Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 073-23632-00035 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.16 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.17 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  
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.18 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a 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.19 Permit Renewal [326 IAC 2-8-3(h)]**

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by 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 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.20 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

---

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

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

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

Any such application shall be certified by 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.21 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  
Indianapolis, Indiana 46204-2251

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

---

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

**B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]**

---

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

B.24 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by 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.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

B.26 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of

issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.27 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### 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 any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (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 and 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]

---

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  
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]**

---

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

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

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

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

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

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for 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]**

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.

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

### **C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

### **C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]**

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

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that

retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by 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.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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

#### **C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by 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  
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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## **Stratospheric Ozone Protection**

### **C.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

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

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

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Corn Processing Facilities

- (a) Two (2) receiving lines, identified as Corn Receiving #1 and Corn Receiving #2, consisting of two (2) huskers, identified as Husker 1 and Husker 2, which each consist of five (5) husking beds, installed in 1976, and modified in 1995 and 2007, exhausting to general ventilation, capacity: 1,000 bushels (56,000 pounds) of ear corn per hour for each line and each husker.
- (b) Two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B, exhausting to Stacks Dry 2A and Dry 2B, installed in 1976, heat input capacity: sixty (60) million British thermal units per hour, each, and a dry rate of 20,238 bushels per batch {500 bushels (28,000 pounds) per hour, each}.
- (c) One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12, installed in 1994 and modified in 2005, equipped with a baghouse for particulate control, identified as Red Dust Collector, capacity: 134,400 pounds of seed corn per hour, total.
- (d) One (1) treater, identified as Treater #3, installed in 1994 and modified in 2005, equipped with a baghouse for particulate control, identified as Red Dust Collector, capacity: 500 bushels (28,000 pounds) of shelled corn per hour.
- (e) One (1) rebagging unit, identified as #13, installed in 1992 and modified in 2005, with a capacity of 114,800 pounds per hour, equipped with a baghouse for particulate control, identified as Red Dust Collector, capacity: 114,800 pounds of seed corn per hour.
- (f) One (1) seed corn debagger, identified as EU34, installed in 2002, exhausting to a baghouse, identified as Red Dust Collector, maximum throughput: 1,000 bushels (56,000 pounds) of seed corn per hour.
- (g) Thirty-seven (37) bulk storage bins, identified as B-1 through B-17 and B-21 through B-40, installed in 1999, throughput: 1,000 bushels (56,000 pounds) of shelled corn per hour. Storage bins B-1 through B-4 have a capacity of 11,000 bushels (770,000 pounds) each; storage bins B-5 through B-8 have a capacity of 15,000 bushels (1,050,000 pounds) each; storage bins B-9 through B-12 have a capacity of 11,000 bushels (770,000 pounds) each; storage bins B-13 through B-17 have a capacity of 4,600 bushels (322,000 pounds) each; storage bins B-21 through B-30 have a capacity of 5,000 bushels (350,000 pounds) each; and storage bins B-31 through B-40 have a capacity of 7,500 bushels (525,000 pounds) each.
- (h) One (1) small lot bagging operation, installed in 2005, consisting of the CBT-100 treater, identified as EU102, an aspirator, identified as EU103, and bagging unit #2, identified as EU104, exhausting to a baghouse, identified as CE14, capacity: 3,550 bushels (198,800 pounds) per hour, total.
- (i) One (1) natural gas-fired bin dryer, identified as Dry 3, approved for construction in 2007, exhausting to Stack Dry 3, with a drying rate of 500 bushels (28,000 pounds) per hour and a heat input capacity of 160 million British thermal units per hour, equipped with eighteen (18) storage bins, identified as Dry 3 Bins, used for drying with a capacity of 2,000 bushels (152,000 pounds), each.
- (j) One (1) corn sheller, identified as Sheller, approved for construction in 2007, exhausting to a baghouse for particulate control, identified as CE 15, capacity: 2,000 bushels (112,000 pounds) of corn per hour.
- (k) Two (2) corn handling lines, identified as Line 1 and Line 2, consisting of the following:

**Facility Description [326 IAC 2-7-5(15)]: Corn Processing Facilities - continued**

- (1) Thirty-two (32) bulk storage bins, identified as B-41 through B-72, approved for construction in 2007, exhausting to a baghouse for particulate control, identified as CE 34, throughput: 1,000 bushels (56,000 pounds) of shelled corn per hour. Storage bins B-41 through B-56 have a capacity of 7,500 bushels (420,000 pounds), each, and storage bins B-57 through B-72 have a capacity of 5,000 bushels (280,000 pounds), each.
  - (2) Two (2) cleaners, identified as Cleaner Line 1 and Cleaner Line 2, approved for construction in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector #1 and White Dust Collector #2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.
  - (3) Two (2) sorters, identified as Sorter Line 1 and Sorter Line 2, approved for construction in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector #1 and White Dust Collector #2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.
  - (4) Two (2) sizers, identified as Sizer Line 1 and Sizer Line 2, approved for construction in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector #1 and White Dust Collector #2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.
  - (5) Sixteen (16) gravity tables, identified as Gravity Tables Line 1 and Gravity Tables Line 2, approved for construction in 2007, equipped with sixteen (16) dust collectors for particulate control, identified as Gravity Table Dust Collectors #1 through #16, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (6) Twenty-four (24) storage bins, identified as Storage Bins Lines 1 and Storage Bins Line 2, approved for construction in 2007, throughput capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
- (l) New treating/packing machinery, consisting of the following:
- (1) Three (3) aspirators, identified as Aspirator #1 through #3, approved for construction in 2007, exhausting to a baghouse, identified as Red Dust Collector, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (2) Two (2) treaters, identified as Treater #1 and #2, approved for construction in 2007, exhausting to a baghouse, identified as Red Dust Collector, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (3) Twelve (12) storage bins, identified as Treating and Packing Storage Bins 1 through 12, approved for construction in 2007, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (4) One (1) debagger, identified as EU106, exhausting to a baghouse, identified as CE14, approved for construction in 2007, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour.

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

THE CONSTRUCTION CONDITIONS IN THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW, FOR THE NEW EMISSION UNITS DESCRIBED IN (k) AND (l) ABOVE.

## Construction Conditions

### General Construction Conditions

#### D.1.1 Permit No Defense

---

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

#### D.1.2 Effective Date of the Permit [IC13-15-5-3]

---

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

#### D.1.3 Modification to Construction Conditions [326 IAC 2]

---

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.

## Operation Conditions

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

#### D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]

---

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the following emission units and control devices shall not exceed the pounds per hour limitation when operating at the stated process weight rates calculated using the following equations:

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:

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

or

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:

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

<b>Emission Unit (baghouse)</b>	<b>Process weight rate (tons per hour)</b>	<b>Allowable particulate emission rate (pounds per hour)</b>
Two (2) Receiving Lines, identified as Receiving Lines #1 and #2 (none)	56.0	45.6
Two (2) Huskers, identified as Husker 1 and 2 (none)	56.0	45.6
One (1) natural gas-fired bin dryer, identified as Dry 2A (Stack Dry 2A)	14.0	24.0
One (1) natural gas-fired bin dryer, identified as Dry 2B (Stack Dry 2B)	14.0	24.0
One (1) natural gas-fired bin dryer, identified as Dry 3 (Stack Dry 3)	14.0	24.0
One (1) debagger, identified as EU34 (Baghouse Red Dust Collector)	28.0	38.2
One (1) Corn Sheller, identified as Sheller (Baghouse CE 15)	56.0	45.6
One (1) rebagging unit, identified as #13 (Baghouse Red Dust Collector)	57.4	45.9
One (1) small lot bagging operation, consisting of EU102 through EU104 (Baghouse CE14)	99.4	51.2

<b>Treating/Packing Machinery, consisting of the following emission units:</b>		
Aspirators #1 through #3 (Baghouse Red Dust Collector)	28.0	38.2
Treater #1 through #3 (Baghouse Red Dust Collector)	42.0	50.2
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12 (Baghouse Red Dust Collector)	67.2	47.4
Twelve (12) Storage Bins, identified as Treating and Packing Storage Bins 1 through 12	28.0	38.2
One (1) debagger, identified as EU106 (Baghouse CE14)	16.8	27.1

<b>Two (2) Corn Handling Lines, identified as Lines 1 and 2, consisting of the following:</b>		
<b>Emission Unit (baghouse)</b>	<b>Process weight rate (tons per hour)</b>	<b>Allowable particulate emission rate (pounds per hour)</b>
Sixty-Nine (69) Bulk Storage Bins, identified as B-1 through B-17 and B-21 through B-72	28.0	38.2
Cleaners, Lines 1 and 2 (White Dust Collector #1 and #2)	28.0	38.2
Eight (8) Gravity Tables, Line 1 (Gravity Table Dust Collectors #1 through #8)	1.75, each	5.97, each
Eight (8) Gravity Tables, Line 2 (Gravity Table Dust Collectors #9 through #16)	1.75, each	5.97, each
Sorters, Lines 1 and 2 (White Dust Collector #1 and #2)	28.0	38.2
Sizers, Lines 1 and 2 (White Dust Collector #1 and #2)	28.0	38.2

In addition, several of the emission units exhaust through the same baghouse or stack. The allowable particulate pursuant to 326 IAC 6-3-2 has been tabulated by stack/exhaust and baghouse as follows:

<b>Stack # or Exhaust</b>	<b>Emission Unit</b>	<b>Process Weight (tons per hour)</b>	<b>PM Emission Rate (pounds per hour)</b>
Red Dust Collector	EU 34	Subtotal of 28.0	38.2
	EU 100 EU 101 EU 105 EU12	Subtotal of 67.2	47.4
	Aspirators #1 - #3	Subtotal of 28.0	38.2
	Treaters #1- #3	Subtotal of 42.0	50.2
			Total: 174
Baghouse CE14	EU102 EU103 EU104 EU106	127.4	53.7
White Dust Collector #1	Sorter, Line 1	14.0	24.0
	Cleaner, Line 1	14.0	24.0
	Sizer, Line 1	14.0	24.0
			Total: 72.0
White Dust Collector #2	Sorter, Line 2	14.0	24.0
	Cleaner, Line 2	14.0	24.0
	Sizer, Line 2	14.0	24.0
			Total: 72.0

**D.1.5 Particulate Matter (PM) [326 IAC 2-2]**

The PM emissions from the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, which are all part of the two (2) corn handling lines, identified as Lines 1 and 2, shall be limited to less than the throughput and emission limits specified in the following table:

<b>Emission Units (Baghouse)</b>	<b>Limited Corn Throughput (tons/yr*)</b>	<b>PM Emission Limit (lbs PM/ton corn)</b>
Line 1: Cleaner, Sorter, Sizer (White Dust Collector #1)	61,320, total	0.062
Line 2: Cleaner, Sorter, and Sizer (White Dust Collector #2)	61,320, total	0.062
Line 1: Eight (8) Gravity Tables (Gravity Table Dust Collectors #1 through #8)	61,320, total	0.269
Line 2: Eight (8) Gravity Tables (Gravity Table Dust Collectors #9 through #16)	61,320, total	0.269
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12 (Red Dust Collector)	294,336	0.061
One (1) small lot bagging operation, consisting of EU102 through EU104 (CE 14)	744,600	0.061
Two (2) Receiving Lines, identified as Corn Receiving #1 and Corn Receiving #2 (none)	70,000	0.035
Two (2) Huskers, identified as Husker 1 and 2 (none)	70,000	0.035

\*Note that "yr" represents twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limitations shall render the requirements of 326 IAC 2-2, PSD, not applicable.

**D.1.6 Particulate Matter (PM<sub>10</sub>) [326 IAC 2-8-4]**

The PM<sub>10</sub> emissions from the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, which are all part of the two (2) corn handling lines, identified as Lines 1 and 2, shall be limited to less than the throughput and emission limits specified in the following table:

<b>Emission Units (Baghouse)</b>	<b>Limited Corn Throughput (tons/yr*)</b>	<b>PM<sub>10</sub> Emission Limit (lbs PM<sub>10</sub> /ton corn)</b>
Line 1: Cleaner, Sorter, Sizer (White Dust Collector #1)	61,320, total	0.062
Line 2: Cleaner, Sorter, and Sizer (White Dust Collector #2)	61,320, total	0.062
Line 1: Eight (8) Gravity Tables (Gravity Table Dust Collectors #1 through #8)	61,320, total	0.269
Line 2: Eight (8) Gravity Tables (Gravity Table Dust Collectors #9 through #16)	61,320, total	0.269
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12 (Red Dust Collector)	294,336	0.034
One (1) small lot bagging operation, consisting of EU102 through EU104 (CE 14)	744,600	0.034
Two (2) Receiving Lines, identified as Corn Receiving #1 and Corn Receiving #2 (none)	70,000	0.0078
Two (2) Huskers, identified as Husker 1 and 2 (none)	70,000	0.034

\*Note that "yr" represents twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limitations shall render the requirements of 326 IAC 2-7, Part 70, not applicable.

**D.1.7 Natural Gas Limit [326 IAC 2-8-4]**

- (a) The natural gas usage at the two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B, shall be less than 268 million cubic feet of gas per twelve (12) consecutive month period, total, with compliance determined at the end of each month. As a result of the natural gas limit:
- (1) NO<sub>x</sub> from the two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B, shall be limited to 100 pounds of NO<sub>x</sub> per million cubic feet of gas, total.
  - (2) CO from the two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B, shall be limited to 84 pounds of CO per million cubic feet of gas, total.
- (b) The natural gas usage at the one (1) natural gas-fired bin dryer, identified as Dry 3, shall be

less than 357 million cubic feet of gas per twelve (12) consecutive month period, with compliance determined at the end of each month. As a result of the natural gas limit:

- (1) NO<sub>x</sub> from the one (1) natural gas-fired bin dryer, identified as Dry 3, shall be limited to 190 pounds of NO<sub>x</sub> per million cubic feet of gas.
  - (2) CO from the one (1) natural gas-fired bin dryer shall be limited to 84 pounds of CO per million cubic feet of gas.
- (c) Compliance with these limitations shall render the requirements of 326 IAC 2-7, Part 70, not applicable.

#### D.1.8 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

- (a) The VOC usage at each of the three (3) treaters, identified as Treaters #1 through #3, shall be limited to less than twenty-five (25.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Compliance with these limits shall render the requirements of 326 IAC 8-1-6 not applicable.

#### D.1.9 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### **Compliance Determination Requirements**

#### D.1.10 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Within 180 days after startup of the two (2) corn handling lines, identified as Lines 1 and 2, to demonstrate compliance with Condition D.1.1, D.1.2 and D.1.3, the Permittee shall perform PM and PM<sub>10</sub> testing for the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, and the two (2) sizers, identified as Sizers Lines 1 and 2, all exhausting to two (2) baghouses, identified as White Dust Collector #1 and #2; and four (4) of the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, exhausting to sixteen (16) baghouses, identified as Gravity Table Dust Collectors #1 - #8 and Gravity Table Dust Collectors #9 - #16, utilizing methods as approved by the Commissioner. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>. Testing shall be conducted in accordance with Section C - Performance Testing.

#### D.1.11 Particulate Control

- (a) In order to comply with Conditions D.1.2 and D.1.3, the baghouses, identified as White Dust Collectors #1 and #2, Gravity Table Dust Collectors #1 through #16, for particulate control shall be in operation and control emissions from the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, and the two (2) sizers, identified as Sizers Lines 1 and 2, the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, and at all times that the emission units are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### **Compliance Monitoring Requirements**

#### D.1.12 Visible Emissions Notations

- (a) Visible emission notations of the White Dust Collector #1 and #2 and Gravity Table Dust

Collectors #1 through #16, exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

#### D.1.13 Baghouse Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the baghouses, identified as White Dust Collectors #1 and #2 and Gravity Table Dust Collectors #1 through #16, used in conjunction with the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, all part of the two (2) Corn Handling Lines, identified as Lines 1 and 2, at least once per day when either of the two (2) corn handling lines is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.1.14 Broken or Failed Bag Detection

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

an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

### **D.1.15 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of the amount of natural gas used per month at the two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B, and the one (1) natural gas-fired bin dryer, identified as Dry 3.
- (b) To document compliance with Conditions D.1.5 and D.1.6, the Permittee shall maintain records of the monthly corn throughput at the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, all part of the two (2) Corn Handling Lines, identified as Lines 1 and 2, the one (1) bagging unit, identified as EU100, the one (1) seed pack fill unit, identified as EU101, the one (1) manual seed pack unit, identified as EU105, the one (1) bagging machine, identified as EU12, the one (1) small lot bagging operation, consisting of EU102 through EU104, and the two (2) receiving lines, identified as Receiving Lines #1 and #2, which consist of two (2) Huskers, identified as Huskers 1 and 2.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.8. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (d) To document compliance with Condition D.1.12, the Permittee shall maintain records of daily visible emission notations of the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, and the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, exhausts.
- (e) To document compliance with Condition D.1.13, the Permittee shall maintain records once per day of the pressure drop.

- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.5 through D.1.8 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).

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

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

Source Name: Monsanto Company  
Source Address: 15489 South US Highway 231 Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Monsanto Company  
Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035

**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: Monsanto Company  
Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035  
Facility: One (1) treater, identified as Treater #1  
Parameter: VOC usage  
Limit: Less than twenty-five (25.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

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

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035  
Facility: One (1) treater, identified as Treater #2  
Parameter: VOC usage  
Limit: Less than twenty-five (25.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

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

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.

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

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035  
Facility: One (1) treater, identified as Treater #3  
Parameter: VOC usage  
Limit: Less than twenty-five (25.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

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

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
 Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
 Mailing Address: P.O. Box 35, Remington, Indiana 47977  
 FESOP No.: F 073-23632-00035  
 Facility: Two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B  
 Parameter: Natural gas usage  
 Limit: Less than 268 million cubic feet (mmCF) of natural gas per twelve (12) consecutive month period, total, with compliance determined at the end of each month.

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

Month	Natural Gas Usage (mmCF)	Natural Gas Usage (mmCF)	Natural Gas Usage (mmCF)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
 Deviation has been reported on \_\_\_\_\_

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
 Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
 Mailing Address: P.O. Box 35, Remington, Indiana 47977  
 FESOP No.: F 073-23632-00035  
 Facility: One (1) natural gas-fired bin dryer, identified as Dry 3  
 Parameter: Natural gas usage  
 Limit: Less than 357 million cubic feet (mmCF) of natural gas per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Natural Gas Usage (mmCF)	Natural Gas Usage (mmCF)	Natural Gas Usage (mmCF)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
 Deviation has been reported on \_\_\_\_\_

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035  
Facilities: Cleaners, Sorters, Sizers, Line 1  
Parameter: Corn Throughput  
Limit: Less than 61,320 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Corn Throughput (tons)	Corn Throughput (tons)	Corn Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035  
Facilities: Cleaners, Sorters, Sizers, Line 2  
Parameter: Corn Throughput  
Limit: Less than 61,320 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Corn Throughput (tons)	Corn Throughput (tons)	Corn Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035  
Facilities: Gravity Tables, Line 1  
Parameter: Corn Throughput  
Limit: Less than 61,320 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Corn Throughput (tons)	Corn Throughput (tons)	Corn Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035  
Facilities: Gravity Tables, Line 2  
Parameter: Corn Throughput  
Limit: Less than 61,320 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Corn Throughput (tons)	Corn Throughput (tons)	Corn Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035  
Facilities: One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12  
Parameter: Corn Throughput  
Limit: Less than 294,336 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Corn Throughput (tons)	Corn Throughput (tons)	Corn Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035  
Facilities: One (1) small lot bagging operation, consisting of EU102 through EU104.  
Parameter: Corn Throughput  
Limit: Less than 744,600 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Corn Throughput (tons)	Corn Throughput (tons)	Corn Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035  
Facilities: Two (2) Receiving Lines, identified as Corn Receiving #1 and Corn Receiving #2  
Parameter: Corn Throughput  
Limit: Less than 70,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Corn Throughput (tons)	Corn Throughput (tons)	Corn Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035  
Facilities: Two (2) Huskers, identified as Husker 1 and Husker 2  
Parameter: Corn Throughput  
Limit: Less than 70,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Corn Throughput (tons)	Corn Throughput (tons)	Corn Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.  
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: Monsanto Company  
Source Address: 15489 South US Highway 231, Remington, Indiana 47977  
Mailing Address: P.O. Box 35, Remington, Indiana 47977  
FESOP No.: F 073-23632-00035

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 <b>NO deviations occurred this reporting period</b>.</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: \_\_\_\_\_

A certification is not required for this report.

## Indiana Department of Environmental Management Office of Air Quality

Addendum to the  
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

**Source Name:** Monsanto Company  
**Source Location:** 15489 South US Highway 231, Remington, Indiana 47977  
**County:** Jasper  
**FESOP:** F 073-23632-00035  
**SIC Code:** 0723  
**Permit Reviewer:** Michael A. Morrone

On January 10, 2007, the Office of Air Quality (OAQ) had a notice published in the Rensselaer Republican newspaper in Jasper County, Indiana, stating that Monsanto Company had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a hybrid corn seed processing plant with baghouses as controls. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

### Change 1:

Reference to the authorized individual has been removed in Section A.1 of the permit as follows:

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

---

The Permittee owns and operates a hybrid corn seed processing plant.

<del>Authorized Individual:</del>	<b>Site Manager</b>
Source Address:	15489 South US Highway 231, Remington, Indiana 47977
Mailing Address:	P.O. Box 35, Remington, Indiana 47977
General Source Phone Number:	(219) 261-2122
SIC Code:	0723
County Location:	Jasper
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source under PSD Rules Minor Source under Section 112 of the Clean Air Act

### Change 2:

The throughput capacities for the two (2) receiving lines, identified as Corn Receiving #1 and #2, which consist of the two (2) Huskers, identified as Husker 1 and Husker 2, have been corrected from 1,000 bushels, total, to 1,000 bushels for each line and each husker. As a result, the potential to emit before controls and the potential to emit reflecting all controls and limits has changed as indicated below. Pages 1 through 10 of Appendix A of this document show these emissions changes in detail. In addition, the description has been updated to accurately reflect the number of husker beds which comprise the two (2) Huskers. The equipment list in Section A.2 and D.1 has been corrected as follows:

Potential to Emit

Pollutant	Potential to Emit (tons/yr)
PM	<b>348360</b>
PM <sub>10</sub>	<b>480185</b>
SO <sub>2</sub>	0.736
VOC	55.2
CO	103
NO <sub>x</sub>	186

Potential to Emit After Issuance

Process/emission unit (Baghouse)	Potential To Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
<del>Corn Receiving #1 and #2, consisting of Huskers 1 and 2 (None) Two (2) Receiving Lines, identified as Corn Receiving #1 and #2, consisting of two (2) Huskers, identified as Husker 1 and Husker 2 (none)</del>	<del>41.8</del> <b>14.7</b>	<del>5.13</del> <b>6.41</b>	-	-	-	-	-
Two (2) natural gas-fired dryers, identified as Dry 2A and Dry 2B (None)	57.9	15.7	0.080	0.737	11.2	13.4	0.241 hexane; 0.253 total
One (1) natural gas-fired bin dryer, identified as Dry 3 (None)	29.2	8.72	0.107	0.982	15.0	33.9	0.321 hexane; 0.337 total
One (1) corn sheller, identified as Sheller (CE 15)	2.49	2.49	-	-	-	-	-
Bulk storage bins, identified as B-1 through B-17 and B-21 through B-72 (None)	3.06	0.772	-	-	-	-	-
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack	8.98	5.00	-	-	-	-	-

Process/emission unit (Baghouse)	Potential To Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
unit, identified as EU105, and one (1) bagging machine, identified as EU12. (Red Dust Collector)							
One (1) rebagging unit, identified as 13 (Red Dust Collector)	15.3	8.55	-	-	-	-	-
One (1) small lot bagging operation, consisting of EU102 through EU104 (CE 14)	22.7	12.7	-	-	-	-	-
One (1) debagger, identified as EU34 (Red Dust Collector)	7.48	4.17	-	-	-	-	-
Two (2) corn handling lines, identified as Line 1 and Line 2, consisting of:							
Two (2) cleaners, identified as Cleaners Lines 1 and 2 (White Dust Collectors #1 and #2)	3.80	3.80	-	-	-	-	-
Two (2) sorters, identified as Sorters Lines 1 and 2 (White Dust Collectors #1 and #2)			-	-	-	-	-
Two (2) sizers, identified as Sizers Lines 1 and 2 (White dust Collectors #1 and #2)			-	-	-	-	-
Sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2 (Gravity Table Dust Collectors #1 through #16)	16.5	16.5	-	-	-	-	-
Twenty-four (24) storage bins, identified as Storage Bins Lines 1 and 2 (None)	3.06	0.772	-	-	-	-	-
New treating/packing machinery, consisting of:							
Three (3) Aspirators, identified as Aspirators #1 through #3 (Red Dust Collector)	7.48	4.17	-	-	-	-	-

Process/emission unit (Baghouse)	Potential To Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Three (3) treaters, identified as Treaters #1 though #3 (Red Dust Collector)	11.2	6.25	-	Less than 25.0, each	-	-	0.621 glycol ethers 0.621 total
Twelve (12) storage bins, identified as Treating and Packing Storage Bins 1 through 12 (None)	3.06	0.772	-	-	-	-	-
One (1) debagger, identified as EU106 (CE 14)	4.49	2.50					
Total Emissions	<del>209</del> <b>211</b>	<del>98.0</del> <b>99.3</b>	0.187	Less than 76.7	26.2	47.3	0.621 glycol ethers 1.21 total

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

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

- (a) Two (2) receiving lines, identified as Corn Receiving #1 and Corn Receiving #2, consisting of two (2) huskers, identified as Husker 1 and Husker 2, **which each consist of five (5) husking beds**, installed in 1976, and modified in 1995 and 2007, exhausting to general ventilation, capacity: 1,000 bushels (56,000 pounds) of ear corn per hour, ~~total for each line and each husker.~~

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]: Corn Processing Facilities**

- (a) Two (2) receiving lines, identified as Corn Receiving #1 and Corn Receiving #2, consisting of two (2) huskers, identified as Husker 1 and Husker 2, **which each consist of five (5) husking beds**, installed in 1976, and modified in 1995 and 2007, exhausting to general ventilation, capacity: 1,000 bushels (56,000 pounds) of ear corn per hour, ~~total for each line and each husker.~~

**Change 3:**

As a result in the change in throughput capacity discussed in Change 2 above, the process weight rate has been corrected for the two (2) receiving lines, identified as Corn Receiving #1 and Corn Receiving #2, which consist of the two (2) huskers, identified as Husker 1 and Husker 2, in Condition D.1.4. In addition, the description has been updated as follows:

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the following emission units and control devices shall not exceed the pounds per hour limitation when operating at the stated process weight rates calculated using the following equations:

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:

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

or

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:

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

Emission Unit (baghouse)	Process weight rate (tons per hour)	Allowable particulate emission rate (pounds per hour)
<del>Corn Receiving 1 and 2</del> <b>Two (2) Receiving Lines, identified as Receiving Lines #1 and #2 (none)</b>	<del>28.0</del> <b>56.0</b>	<del>38.2</del> <b>45.6</b>
<del>Huskers 1 and 2, part of Corn Receiving 1 and 2</del> <b>Two (2) Huskers, identified as Husker 1 and 2 (none)</b>	<del>28.0</del> <b>56.0</b>	<del>38.2</del> <b>45.6</b>
One (1) natural gas-fired bin dryer, identified as Dry 2A (Stack Dry 2A)	14.0	24.0
One (1) natural gas-fired bin dryer, identified as Dry 2B (Stack Dry 2B)	14.0	24.0
One (1) natural gas-fired bin dryer, identified as Dry 3 (Stack Dry 3)	14.0	24.0
One (1) debagger, identified as EU34 (Baghouse Red Dust Collector)	28.0	38.2
One (1) Corn Sheller, identified as Sheller (Baghouse CE 15)	56.0	45.6
One (1) rebagging unit, identified as #13 (Baghouse Red Dust Collector)	57.4	45.9
One (1) small lot bagging operation, consisting of EU102 through EU104 (Baghouse CE14)	99.4	51.2

**Change 4:**

As a result of the increase in capacities for the two (2) receiving lines, identified as Corn Receiving #1 and #2, which consist of the two (2) Huskers, identified as Husker 1 and Husker 2, which caused the potential to emit PM<sub>10</sub> to increase above 100 tons per year, a throughput limit for each has been added to Conditions D.1.5 and D.1.6. In addition, the descriptions of the emission units were updated in each condition and reference to the baghouse CE 14, which is used at the one (1) small lot

bagging operation, consisting of EU 102 through 104, was added in Condition D.1.6 as follows:

**D.1.5 Particulate Matter (PM) [326 IAC 2-2]**

The PM emissions from the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, which are all part of the two (2) corn handling lines, identified as Lines 1 and 2, shall be limited to less than the throughput and emission limits specified in the following table:

Emission Units (Baghouse)	Limited Corn Throughput (tons/yr*)	PM Emission Limit (lbs PM/ton corn)
Line 1: Cleaner, Sorter, Sizer (White Dust Collector #1)	61,320, total	0.062
Line 2: Cleaner, Sorter, and Sizer (White Dust Collector #2)	61,320, total	0.062
Line 1: Eight (8) Gravity Tables (Gravity Table Dust Collectors #1 through #8)	61,320, total	0.269
Line 2: Eight (8) Gravity Tables (Gravity Table Dust Collectors #9 through #16)	61,320, total	0.269
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12 (Red Dust Collector)	294,336	0.061
One (1) small lot bagging operation, consisting of EU102 through EU104 (CE 14)	744,600	0.061
<b>Two (2) Receiving Lines, identified as Corn Receiving #1 and Corn Receiving #2 (none)</b>	<b>70,000</b>	<b>0.035</b>
<b>Two (2) Huskers, identified as Husker 1 and 2 (none)</b>	<b>70,000</b>	<b>0.035</b>

\*Note that "yr" represents twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limitations shall render the requirements of 326 IAC 2-2, PSD, not applicable.

**D.1.6 Particulate Matter (PM<sub>10</sub>) [326 IAC 2-8-4]**

The PM<sub>10</sub> emissions from the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, which are all part of the two (2) corn handling lines, identified as Lines 1 and 2, shall be limited to less than the throughput and emission limits specified in the following table:

Emission Units (Baghouse)	Limited Corn Throughput (tons/yr*)	PM <sub>10</sub> Emission Limit (lbs PM <sub>10</sub> /ton corn)
Line 1: Cleaner, Sorter, Sizer (White Dust Collector #1)	61,320, total	0.062
Line 2: Cleaner, Sorter, and Sizer (White Dust Collector #2)	61,320, total	0.062
Line 1: Eight (8) Gravity Tables (Gravity Table Dust Collectors #1 through #8)	61,320, total	0.269
Line 2: Eight (8) Gravity Tables (Gravity Table Dust Collectors #9 through #16)	61,320, total	0.269
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12 (Red Dust Collector)	294,336	0.034
One (1) small lot bagging operation, consisting of EU102 through EU104 <b>(CE 14)</b>	744,600	0.034
<b>Two (2) Receiving Lines, identified as Corn Receiving #1 and Corn Receiving #2 (none)</b>	<b>70,000</b>	<b>0.0078</b>
<b>Two (2) Huskers, identified as Husker 1 and 2 (none)</b>	<b>70,000</b>	<b>0.034</b>

\*Note that "yr" represents twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limitations shall render the requirements of 326 IAC 2-7, Part 70, not applicable.

**Change 5:**

As a result of the new throughput limits for the two (2) receiving lines, identified as Corn Receiving #1 and #2, which consist of the two (2) Huskers, identified as Husker 1 and Husker 2, Condition D.1.15 has been updated as follows:

**D.1.15 Record Keeping Requirements**

- 
- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of the amount of natural gas used per month at the two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B, and the one (1) natural gas-fired bin dryer, identified as Dry 3.
  - (b) To document compliance with Conditions D.1.5 and D.1.6, the Permittee shall maintain records of the monthly corn throughput at the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1

and 2, all part of the two (2) Corn Handling Lines, identified as Lines 1 and 2, the one (1) bagging unit, identified as EU100, the one (1) seed pack fill unit, identified as EU101, the one (1) manual seed pack unit, identified as EU105, the one (1) bagging machine, identified as EU12, the one (1) small lot bagging operation, consisting of EU102 through EU104, **and the two (2) receiving lines, identified as Receiving Lines #1 and #2, which consist of the two (2) Huskers, identified as Huskers 1 and 2.**

- (c) To document compliance with Condition D.1.8, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.8. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (d) To document compliance with Condition D.1.12, the Permittee shall maintain records of daily visible emission notations of the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, and the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, exhausts.
- (e) To document compliance with Condition D.1.13, the Permittee shall maintain records once per day of the pressure drop.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Change 6:**

Two (2) quarterly report forms were added at the end of the permit due to the new corn throughput limits for the two (2) receiving lines, identified as Corn Receiving #1 and #2, which consist of the two (2) Huskers, identified as Husker 1 and Husker 2, as follows:

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

**FESOP Quarterly Report**

**Source Name:** Monsanto Company  
**Source Address:** 15489 South US Highway 231, Remington, Indiana 47977  
**Mailing Address:** P.O. Box 35, Remington, Indiana 47977  
**FESOP No.:** F 073-23632-00035  
**Facilities:** Two (2) Receiving Lines, identified as Corn Receiving #1 and Corn Receiving #2  
**Parameter:** Corn Throughput  
**Limit:** Less than 70,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Corn Throughput (tons)	Corn Throughput (tons)	Corn Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on \_\_\_\_\_

**Submitted by:** \_\_\_\_\_

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

**Signature:** \_\_\_\_\_

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

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

**Attach a signed certification to complete this report.**

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

**FESOP Quarterly Report**

**Source Name:** Monsanto Company  
**Source Address:** 15489 South US Highway 231, Remington, Indiana 47977  
**Mailing Address:** P.O. Box 35, Remington, Indiana 47977  
**FESOP No.:** F 073-23632-00035  
**Facilities:** Two (2) Huskers, identified as Husker 1 and Husker 2  
**Parameter:** Corn Throughput  
**Limit:** Less than 70,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Corn Throughput (tons)	Corn Throughput (tons)	Corn Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
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**

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

**Source Background and Description**

**Source Name:** Monsanto Company  
**Source Location:** 15489 South US Highway 231, Remington, Indiana 47977  
**County:** Jasper  
**SIC Code:** 0723  
**Operation Permit No.:** F 073-23632-00035  
**Permit Reviewer:** Michael A. Morrone/MES

The Office of Air Quality (OAQ) has reviewed a transition from an MSOP to a FESOP application from Monsanto Company relating to the operation of a hybrid corn seed processing plant, and the construction of new units at that source.

**History**

Monsanto Company was issued MSOP 073-20867-00035 on August 3, 2005. IDEM, OAQ received an application on September 8, 2006 requesting a change from an MSOP to a FESOP because several new emission units are being added to the source and the unrestricted potential to emit of several criteria pollutants will now exceed Title V thresholds.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) Two (2) receiving lines, identified as Corn Receiving #1 and Corn Receiving #2, consisting of two (2) huskers, identified as Husker 1 and Husker 2, installed in 1976, and modified in 1995, exhausting to general ventilation, capacity: 1,000 bushels (56,000 pounds) of ear corn per hour, total.
- (b) Two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B, exhausting to Stacks Dry 2A and Dry 2B, installed in 1976, heat input capacity: sixty (60) million British thermal units per hour, each, and a dry rate of 20,238 bushels per batch {500 bushels (28,000 pounds) per hour, each}.
- (c) One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12, installed in 1994 and modified in 2005, equipped with a baghouse for particulate control, identified as Red Dust Collector, capacity: 134,400 pounds of seed corn per hour, total.
- (d) One (1) treater, identified as Treater #3, installed in 1994 and modified in 2005, equipped with a baghouse for particulate control, identified as Red Dust Collector, capacity: 500 bushels (28,000 pounds) of shelled corn per hour.
- (e) One (1) rebagging unit, identified as #13, installed in 1992 and modified in 2005, with a capacity of 114,800 pounds per hour, equipped with a baghouse for particulate control, identified as Red Dust Collector, capacity: 114,800 pounds of seed corn per hour.
- (f) One (1) seed corn debagger, identified as EU34, installed in 2002, exhausting to a baghouse, identified as Red Dust Collector, maximum throughput: 1,000 bushels (56,000 pounds) of seed corn per hour.

- (g) Thirty-seven (37) bulk storage bins, identified as B-1 through B-17 and B-21 through B-40, installed in 1999, throughput: 1,000 bushels (56,000 pounds) of shelled corn per hour. Storage bins B-1 through B-4 have a capacity of 11,000 bushels (770,000 pounds) each; storage bins B-5 through B-8 have a capacity of 15,000 bushels (1,050,000 pounds) each; storage bins B-9 through B-12 have a capacity of 11,000 bushels (770,000 pounds) each; storage bins B-13 through B-17 have a capacity of 4,600 bushels (322,000 pounds) each; storage bins B-21 through B-30 have a capacity of 5,000 bushels (350,000 pounds) each; and storage bins B-31 through B-40 have a capacity of 7,500 bushels (525,000 pounds) each.
- (h) One (1) small lot bagging operation, installed in 2005, consisting of the CBT-100 treater, identified as EU102, an aspirator, identified as EU103, and bagging unit #2, identified as EU104, exhausting to a baghouse, identified as CE14, capacity: 3,550 bushels (198,800 pounds) per hour, total.

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

There are no unpermitted emission units and pollution control equipment during this review.

### **New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval**

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (i) One (1) natural gas-fired bin dryer, identified as Dry 3, approved for construction in 2007, exhausting to Stack Dry 3, with a drying rate of 500 bushels (28,000 pounds) per hour and a heat input capacity of 160 million British thermal units per hour, equipped with eighteen (18) storage bins, identified as Dry 3 Bins, used for drying with a capacity of 2,000 bushels (152,000 pounds), each.
- (j) One (1) corn sheller, identified as Sheller, approved for construction in 2007, exhausting to a baghouse for particulate control, identified as CE 15, capacity: 2,000 bushels (112,000 pounds) of corn per hour.
- (k) Two (2) corn handling lines, identified as Line 1 and Line 2, consisting of the following:
  - (1) Thirty-two (32) bulk storage bins, identified as B-41 through B-72, approved for construction in 2007, exhausting to a baghouse for particulate control, identified as CE 34, throughput: 1,000 bushels (56,000 pounds) of shelled corn per hour. Storage bins B-41 through B-56 have a capacity of 7,500 bushels (420,000 pounds), each, and storage bins B-57 through B-72 have a capacity of 5,000 bushels (280,000 pounds), each.
  - (2) Two (2) cleaners, identified as Cleaner Line 1 and Cleaner Line 2, approved for construction in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector #1 and White Dust Collector #2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.
  - (3) Two (2) sorters, identified as Sorter Line 1 and Sorter Line 2, approved for construction in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector #1 and White Dust Collector #2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.

- (4) Two (2) sizers, identified as Sizer Line 1 and Sizer Line 2, approved for construction in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector #1 and White Dust Collector #2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.
  - (5) Sixteen (16) gravity tables, identified as Gravity Tables Line 1 and Gravity Tables Line 2, approved for construction in 2007, equipped with sixteen (16) dust collectors for particulate control, identified as Gravity Table Dust Collectors #1 through #16, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (6) Twenty-four (24) storage bins, identified as Storage Bins Lines 1 and Storage Bins Line 2, approved for construction in 2007, throughput capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
- (l) New treating/packing machinery, consisting of the following:
- (1) Three (3) aspirators, identified as Aspirator #1 through #3, approved for construction in 2007, exhausting to a baghouse, identified as Red Dust Collector, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (2) Two (2) treaters, identified as Treater #1 and #2, approved for construction in 2007, exhausting to a baghouse, identified as Red Dust Collector, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (3) Twelve (12) storage bins, identified as Treating and Packing Storage Bins 1 through 12, approved for construction in 2007, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (4) One (1) debagger, identified as EU106, exhausting to a baghouse, identified as CE14, approved for construction in 2007, capacity: 600 bushels (33,600 pounds) of shelled corn per hour.

Please note that the three (3) baghouses, identified as the Red Dust Collector, CE 15, and CE 34, do not have to be operated in order for the emission units which they control particulate emissions from to comply with any rules.

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

The following facilities have been removed from the source and are not included in the proposed permit:

- (a) Two (2) shellers, identified as #3 and #4, installed in 1991, each with a capacity of 100,800 pounds per hour, and equipped with four (4) cyclones, identified as #3A, #3B, #4A, and #4B, for control.
- (b) One (1) ear corn aspirator, identified as #5, installed in 1985, with a capacity of 201,600 pounds per hour, and equipped with one (1) cyclone, identified as #5A, for control.
- (c) One (1) Cimbria Delta 117 corn grain cleaner, identified as #14, installed in 2003, with a capacity of 33,600 pounds per hour, and equipped with one (1) cyclone, identified as #14A, and one (1) bagfilter, identified as #14B, for control. Air from the control units is exhausted inside the building.
- (d) One (1) sizing machinery, identified as #7, installed in 1976, with a capacity of 33,600 pounds per hour, and equipped with one (1) cyclone, identified as #7A, for control. The

air from the control unit is exhausted inside the building.

- (e) Two (2) corn grain Duo-aspirators, identified as #8 and #9, installed in 1976, each with a capacity of 17,000 pounds per hour. Duo-aspirator #8 is equipped with one (1) cyclone, identified as #8A, and Duo-aspirator #9 is equipped with one (1) cyclone, identified as #10A, for control.
- (f) Two (2) gravity tables, identified as #10 and #11, installed in 1976, each with a capacity of 14,000 pounds per hour, and equipped with two (2) cyclones, identified as #9A and #11A.

### **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 million (10,000,000) Btu per hour, with no boilers.
- (b) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to one thousand (1,000) and annual throughputs less than twelve thousand (12,000) gallons.
  - (2) Vessels storage the following: hydraulic oils, lubricating oils, machining oils, and machining fluids.
- (c) Paved and unpaved roads and parking lots with public access.

### **Existing Approvals**

The source has been operating under the previous MSOP 073-20867-00035 issued on August 3, 2005, and the following amendments and revisions:

- (a) SPR 073-21252-00035, issued on October 17, 2005; and
- (b) NOC 073-23494-00035, issued on September 19, 2006.

All conditions from previous approvals were incorporated into this FESOP.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

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

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

An administratively complete FESOP application for the purposes of this review was received on September 8, 2006. Additional information was received on November 3 and 20, 2006.

### Emission Calculations

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

### Potential to Emit

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

Pollutant	Potential to Emit (tons/yr)
PM	348
PM <sub>10</sub>	180
SO <sub>2</sub>	0.736
VOC	55.2
CO	103
NO <sub>x</sub>	186

HAPs	Potential to Emit (tons/yr)
Hexane	2.21
Glycol Ether	0.621
Formaldehyde	0.092
Toluene	0.004
Benzene	0.003
Nickel	0.003
Chromium	0.002
Lead, Dichlorobenzene, Cadmium, Manganese	Less than or equal to 0.001, each
Total	2.94

The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM<sub>10</sub>, CO, and NO<sub>x</sub> are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

**Potential to Emit After Issuance**

The source has opted to operate as 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.

Process/emission unit (Baghouse)	Potential To Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Corn Receiving #1 and #2, consisting of Huskers 1 and 2 (None)	11.8	5.13	-	-	-	-	-
Two (2) natural gas-fired dryers, identified as Dry 2A and Dry 2B (None)	57.9	15.7	0.080	0.737	11.2	13.4	0.241 hexane; 0.253 total
One (1) natural gas-fired bin dryer, identified as Dry 3 (None)	29.2	8.72	0.107	0.982	15.0	33.9	0.321 hexane; 0.337 total
One (1) corn sheller, identified as Sheller (CE 15)	2.49	2.49	-	-	-	-	-
Bulk storage bins, identified as B-1 through B-17 and B-21 through B-72 (None)	3.06	0.772	-	-	-	-	-
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12. (Red Dust Collector)	8.98	5.00	-	-	-	-	-
One (1) rebagging unit, identified as 13 (Red Dust Collector)	15.3	8.55	-	-	-	-	-
One (1) small lot bagging operation, consisting of EU102 through EU104 (CE 14)	22.7	12.7	-	-	-	-	-
One (1) debagger, identified as EU34 (Red Dust Collector)	7.48	4.17	-	-	-	-	-

Process/emission unit (Baghouse)	Potential To Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
<b>Two (2) corn handling lines, identified as Line 1 and Line 2, consisting of:</b>							
Two (2) cleaners, identified as Cleaners Lines 1 and 2 (White Dust Collectors #1 and #2)	3.80	3.80	-	-	-	-	-
Two (2) sorters, identified as Sorters Lines 1 and 2 (White Dust Collectors #1 and #2)			-	-	-	-	-
Two (2) sizers, identified as Sizers Lines 1 and 2 (White dust Collectors #1 and #2)			-	-	-	-	-
Sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2 (Gravity Table Dust Collectors #1 through #16)	16.5	16.5	-	-	-	-	-
Twenty-four (24) storage bins, identified as Storage Bins Lines 1 and 2 (None)	3.06	0.772	-	-	-	-	-
<b>New treating/packing machinery, consisting of:</b>							
Three (3) Aspirators, identified as Aspirators #1 through #3 (Red Dust Collector)	7.48	4.17	-	-	-	-	-
Three (3) treaters, identified as Treaters #1 through #3 (Red Dust Collector)	11.2	6.25	-	Less than 25.0, each	-	-	0.621 glycol ethers 0.621 total
Twelve (12) storage bins, identified as Treating and Packing Storage Bins 1 through 12 (None)	3.06	0.772	-	-	-	-	-
One (1) debagger, identified as EU106 (CE 14)	4.49	2.50					
<b>Total Emissions</b>	<b>209</b>	<b>98.0</b>	<b>0.187</b>	<b>Less than 76.7</b>	<b>26.2</b>	<b>47.3</b>	<b>0.621 glycol ethers 1.21 total</b>

- (a) VOC usage from the three (3) treaters, identified as Treaters #1 through #3, are limited to less than twenty-five (25.0) tons per twelve consecutive month period, each, with compliance determined at the end of each month. Compliance with these limitations will render the requirements of 326 IAC 8-1-6, not applicable. However, the unrestricted potential to emit for the three (3) treaters is 48.2 tons per year and the unrestricted total potential to emit is 48.2 tons per year.
- (b) PM and PM<sub>10</sub> emissions from the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, the one (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12, and the one (1) small lot bagging operation, consisting of EU102 through EU104, are limited as described under 326 IAC 2-2, PSD, and 326 IAC 2-8-4, FESOP, in the "State Rule Applicability – Entire Source Section of this document."

**County Attainment Status**

The source is located in Jasper County.

Pollutant	Status
PM <sub>2.5</sub>	attainment
PM <sub>10</sub>	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 and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Jasper County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (b) Jasper County has been classified as unclassifiable or attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire Source Section of this document.
- (c) Jasper County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source Section of this document.

- (d) 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.
- (e) **Fugitive Emissions**  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD, 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	209
PM <sub>10</sub>	98.0
SO <sub>2</sub>	0.187
VOC	Less than 51.7
CO	26.2
NO <sub>x</sub>	47.3
Single HAP (Glycol Ethers)	0.621
Total HAPs	1.21

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or greater and it is not in one of the twenty-eight (28) listed source categories.
- (b) These emissions are based on the calculations on pages 1 through 10 of Appendix A of this document.

### Federal Rule Applicability

- (a) This source is not a grain terminal elevator because it has a permanent storage capacity of less than 2,500,000 bushels and is not a animal food manufacturer, pet food manufacturer, cereal manufacturer, brewery, or a livestock feedlot. In addition, this source is not a grain storage elevator because it is not a wheat flour mill, a wet corn mill, a dry corn mill, nor a soybean oil extraction plant, and has a storage capacity that is less than one million (1,000,000) bushels. Therefore, the New Source Performance Standard, 40 CFR 60, Subpart DD, Standards of Performance for Grain Elevators, is not included in the permit.
- (b) There are no other New Source Performance Standards included in the permit for this source.

- (c) This source is an area source for HAPs. Therefore, the requirements of the National Emission Standard for Hazardous Air Pollutants, 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, are not included in the permit.
- (d) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit for the source.

**State Rule Applicability – Entire Source**

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

- (a) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.
- (b) The unrestricted PM emissions from the source are greater than two-hundred fifty (250) tons per year. However, the source will limit PM emissions to less than two-hundred fifty (250) tons per year, as described in the following table:

<b>Baghouse (Emission Units)</b>	<b>Limited Corn Throughput (tons/yr*)</b>	<b>PM Emission Limit (lbs PM/ton corn)</b>	<b>Limited PM Emissions (tons/yr)</b>
Line 1: Cleaner, Sorter, Sizer (White Dust Collector #1)	61,320, total	0.062	3.80
Line 2: Cleaner, Sorter, and Sizer (White Dust Collector #2)	61,320, total	0.062	3.80
Line 1: Eight (8) Gravity Tables (Gravity Table Dust Collectors #1 through #8)	61,320, total	0.269	1.03, each 8.25, total
Line 2: Eight (8) Gravity Tables (Gravity Table Dust Collectors #9 through #16)	61,320, total	0.269	1.03, each 8.25, total
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12 (Red Dust Collector)	294,336	0.061	8.98
One (1) small lot bagging operation, consisting of EU102 through EU104 (CE 14)	744,600	0.061	22.7

\* Note that "yr" represents twelve (12) consecutive month period.

Compliance with these limitations shall limit the PM emissions from the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, the one (1) bagging unit, identified as EU100, the one (1) seed pack fill unit, identified as EU101, the one (1) manual seed pack unit, identified as EU105, the one (1) bagging machine, identified as EU12, and the one (1)

small lot bagging operation, consisting of EU102 through EU104 to a total of 55.1 tons per year and less than two-hundred fifty (250) tons per year from the entire source (See page 10 of Appendix A of this document).

The baghouses for particulate control shall be in operation and control emissions from the two (2) cleaners, the two (2) sorters, the two (2) sizers, and the sixteen (16) gravity tables, at all times when these emission units are in operation.

- (c) The unrestricted potential to emit and thus the potential to emit PM<sub>10</sub>, VOC, NO<sub>x</sub>, CO, and SO<sub>2</sub> are less than two-hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source, pursuant to 326 IAC 2-2, PSD.

326 IAC 2-4.1-1 (New source toxics control)

The unrestricted potential to emit of a single HAP is less than ten (10.0) tons per year and is less than twenty-five (25.0) tons per year for a total of all HAPs. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8-4, FESOP

The source-wide emissions of PM<sub>10</sub>, NO<sub>x</sub>, and CO shall be limited to less than one-hundred (100) tons per year. Compliance with the following limitations will allow the source to comply with the requirements of 326 IAC 2-8-4, FESOP:

- (a) The two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B, and the one (1) natural gas-fired bin dryer, identified as Dry 3, shall have their NO<sub>x</sub> and CO emissions limited as described in the following table:

Emission Unit	Limited natural gas usage (mmCF/yr)	NO <sub>x</sub> limit (lbs NO <sub>x</sub> /mmCF)	CO limit (lbs CO/mmCF)	Limited NO <sub>x</sub> emissions (tons/yr)	Limited CO emissions (tons/yr)
Dry 2A and Dry 2B	268	100	84	13.4	11.2
Dry 3	357	190	84	33.9	15.0

As described above, the natural gas usage from the two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B, shall be limited to 268 million cubic feet of gas per twelve (12) consecutive month period, with compliance determined at the end of each month and the natural gas usage from the one (1) natural gas-fired bin dryer, identified as Dry 3, shall be limited to 357 million cubic feet of gas per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with these limitations will limit the NO<sub>x</sub> and CO emissions from the two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B, and the one (1) natural gas-fired bin dryer, identified as Dry 3, to the values in the table above and less than one-hundred (100) tons per year for the entire source (See pages 2 through 5 and page 10 of Appendix A of this document for detailed emissions calculations).

- (b) The two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, which are all part of the two (2) corn handling lines, identified as Lines 1 and 2, the one (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12, and the one (1) small lot bagging operation, identified as EU102 through EU104, shall have their PM<sub>10</sub> emissions limited as described in the following table:

<b>Emission Units (Baghouse)</b>	<b>Limited Corn Throughput (tons/yr*)</b>	<b>PM<sub>10</sub> Limit (lbs PM<sub>10</sub> /ton corn)</b>	<b>Limited PM<sub>10</sub> Emissions (tons/yr)</b>
Line 1: Cleaner, Sorter, Sizer (White Dust Collector #1)	61,320, total	0.062	3.80
Line 2: Cleaner, Sorter, and Sizer (White Dust Collector #2)	61,320, total	0.062	3.80
Line 1: Eight (8) Gravity Tables (Gravity Table Dust Collectors #1 through #8)	61,320, total	0.269	1.03, each 8.25, total
Line 2: Eight (8) Gravity Tables (Gravity Table Dust Collectors #9 through #16)	61,320, total	0.269	1.03, each 8.25, total
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12 (Red Dust Collector)	294,336	0.034	5.00
One (1) small lot bagging operation, consisting of EU102 through EU104 (CE 14)	744,600	0.034	12.7

\* Note that "yr" represents twelve (12) consecutive month period.

Compliance with these limitations will limit the PM<sub>10</sub> emissions from the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, the one (1) bagging unit, identified as EU100, the one (1) seed pack fill unit, identified as EU101, the one (1) manual seed pack unit, identified as EU105, and the one (1) bagging machine, identified as EU12, and the one (1) small lot bagging operation, consisting of EU102 through EU104, to 41.8 tons per year and less than one-hundred (100) tons per year from the entire source.

The baghouses for particulate control shall be in operation and control emissions from the two (2) cleaners, the two (2) sorters, the two (2) sizers, and the sixteen (16) gravity tables, at all times when these emission units are in operation.

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 Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

**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 particulate emission rate from the following emission units and control devices shall not exceed the pounds per hour limitation when operating at the stated process weight rates calculated using the following equations:

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:

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

or

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:

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

Emission Unit (baghouse)	Process weight rate (tons per hour)	Allowable particulate emission rate (pounds per hour)	Unrestricted potential emissions (pounds per hour)	How will unit comply with 326 IAC 6-3-2?
Corn Receiving 1 and 2 (none)	28.0	38.2	0.980	Unrestricted emissions are less than allowable.
Huskers 1 and 2, part of Corn Receiving 1 and 2 (none)	28.0	38.2	1.71	Unrestricted emissions are less than allowable.
One (1) natural gas-fired bin dryer, identified as Dry 2A (Stack Dry 2A)	14.0	24.0	6.69	Unrestricted emissions are less than allowable.

<b>Emission Unit (baghouse)</b>	<b>Process weight rate (tons per hour)</b>	<b>Allowable particulate emission rate (pounds per hour)</b>	<b>Unrestricted potential emissions (pounds per hour)</b>	<b>How will unit comply with 326 IAC 6-3-2?</b>
One (1) natural gas-fired bin dryer, identified as Dry 2B (Stack Dry 2B)	14.0	24.0	6.69	Unrestricted emissions are less than allowable.
One (1) natural gas-fired bin dryer, identified as Dry 3 (Stack Dry 3)	14.0	24.0	6.69	Unrestricted emissions are less than allowable.
One (1) debagger, identified as EU34 (Baghouse Red Dust Collector)	28.0	38.2	1.71	Unrestricted emissions are less than allowable.
One (1) Corn Sheller, identified as Sheller (Baghouse CE 15)	56.0	45.6	0.570	Unrestricted emissions are less than allowable.
One (1) rebagging unit, identified as #13 (Baghouse Red Dust Collector)	57.4	45.9	3.49	Unrestricted emissions are less than allowable.
One small lot bagging operation, consisting of EU102 through EU104 (Baghouse CE 14)	99.4	51.2	6.07	Unrestricted emissions are less than allowable.
<b>Treating/Packing Machinery, consisting of the following emission units:</b>				
Aspirators #1 through #3 (Baghouse Red Dust Collector)	28.0	38.2	1.71	Unrestricted emissions are less than allowable.
Treaters #1 through #3 (Baghouse Red Dust Collector)	42.0	50.2	2.56	Unrestricted emissions are less than allowable.
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12 (Baghouse Red Dust Collector)	67.2	47.4	4.11	Unrestricted emissions are less than allowable.

<b>Emission Unit (baghouse)</b>	<b>Process weight rate (tons per hour)</b>	<b>Allowable particulate emission rate (pounds per hour)</b>	<b>Unrestricted potential emissions (pounds per hour)</b>	<b>How will unit comply with 326 IAC 6-3-2?</b>
Twelve (12) Storage Bins, identified as Treating and Packing Storage Bins 1 through 12	28.0	38.2	0.70	Unrestricted emissions are less than allowable.
One (1) debagger, identified as EU106 (Baghouse CE 14)	16.8	27.1	1.03	Unrestricted emissions are less than allowable
<b>Two (2) Corn Handling Lines, identified as Lines 1 and 2, consisting of the following:</b>				
Sixty-Nine (69) Bulk Storage Bins, identified as B-1 through B-17 and B-21 through B-72	28.0	38.2	0.700	Unrestricted emissions are less than allowable.
Cleaners, Lines 1 and 2 (White Dust Collector #1 and #2)	28.0	38.2	10.5	Unrestricted emissions are less than allowable.
Eight (8) Gravity Tables, Line 1 (Gravity Table Dust Collectors #1 through #8)	1.75, each	5.97, each	0.660, each	Unrestricted emissions are less than allowable for each table.
Eight (8) Gravity Tables, Line 2 (Gravity Table Dust Collectors #9 through #16)	1.75, each	5.97, each	0.660, each	Unrestricted emissions are less than allowable for each table.
Sorters, Lines 1 and 2 (White Dust Collector #1 and #2)	28.0	38.2	10.5	Unrestricted emissions are less than allowable.
Sizers, Lines 1 and 2 (White Dust Collector #1 and #2)	28.0	38.2	1.71	Unrestricted emissions are less than allowable.

Therefore, the particulate rate calculated for each emission unit shows that each emission unit can comply with the calculated allowable particulate emission rate pursuant to 326 IAC 6-3-2 as shown in the above table.

In addition, several of the emission units exhaust through the same baghouse or stack. The allowable particulate pursuant to 326 IAC 6-3-2 has been tabulated by stack/exhaust and baghouse as follows:

Stack # or Exhaust	Emission Unit	Process Weight (tons per hour)	PM Emission Rate (pounds per hour)
Red Dust Collector	EU 34	Subtotal of 28.0	38.2
	EU 100 EU 101 EU 105 EU12	Subtotal of 67.2	47.4
	Aspirators #1 - #3	Subtotal of 28.0	38.2
	Treaters #1- #3	Subtotal of 42.0	50.2
			Total: 174
Baghouse CE14	EU102 EU103 EU104 EU106	127.4	53.7
White Dust Collector #1	Sorter, Line 1	14.0	24.0
	Cleaner, Line 1	14.0	24.0
	Sizer, Line 1	14.0	24.0
			Total: 72.0

326 IAC 8-1-6 (New facilities; general reduction requirements)

The potential to emit VOC from all facilities except the three (3) treaters, identified as Treaters 1 through 3, are less than twenty-five (25.0) tons per year. The VOC usage from the three (3) treaters, identified as Treaters 1 through 3, approved for construction in 2007, shall be limited to less than twenty-five (25.0) tons of per year, each, when coating seeds. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

**Testing Requirements**

- (a) Within 180 days after startup of the two (2) corn handling lines, identified as Lines 1 and 2, to demonstrate compliance with 326 IAC 6-3-2 and 326 IAC 2-8-4, the Permittee shall perform PM and PM<sub>10</sub> testing for two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, and the two (2) sizers, identified as Sizers Lines 1 and 2, all exhausting to two (2) baghouses, identified as White Dust Collector #1 and #2; and four (4) of the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, exhausting to sixteen (16) baghouses, identified as Gravity Table Dust Collectors #1 through #8 and Gravity Table Dust Collectors #9 through #16, utilizing methods as approved by the Commissioner. PM<sub>10</sub> includes both filterable and condensable PM<sub>10</sub>.
- (b) No stack tests have been incorporated into the proposed FESOP for the three (3) treaters, identified as Treaters #1 through #3, because the emissions from the seed coating operations are based upon material usage and the MSDSs and are documented by the record keeping and reporting requirements of the proposed FESOP.

**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 two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, all part of the two (2) Corn Handling Lines, identified as Lines 1 and 2, have the following Compliance Determination Requirements

- (a) Within 180 days after startup of the two (2) corn handling lines, identified as Lines 1 and 2, to demonstrate compliance with 326 IAC 6-3-2 and 326 IAC 2-8-4, the Permittee shall perform PM and PM<sub>10</sub> testing for two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, and the two (2) sizers, identified as Sizers Lines 1 and 2, all exhausting to two (2) baghouses, identified as White Dust Collector #1 and #2; and four (4) of the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, exhausting to sixteen (16) baghouses, identified as Gravity Table Dust Collectors #1 through #8 and Gravity Table Dust Collectors #9 through #16, utilizing methods as approved by the Commissioner. PM<sub>10</sub> includes both filterable and condensable PM<sub>10</sub>.
- (b) The baghouses for particulate control shall be in operation and control emissions from the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, all part of the two (2) Corn Handling Lines, identified as Lines 1 and 2, at all times that the emission units are in operation.
- (c) 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.

The two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, all part of the two (2) Corn Handling Lines, identified as Lines 1 and 2, have the following Compliance Monitoring Requirements:

- (a) Visible emission notations of the White Dust Collector #1 and #2 and Gravity Table Dust Collector #1 through #16 exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (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) The Permittee shall record the pressure drop across the baghouses, identified as White Dust Collectors #1 and #2 and Gravity Table Dust Collectors #1 through #16, used in conjunction with the two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, all part of the two (2) Corn Handling Lines, identified as Lines 1 and 2, at least once per day when the two (2) corn handling lines are in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (g) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (h) 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).
- (i) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

## **Conclusion**

The construction and operation of this hybrid corn seed processing plant shall be subject to the conditions of the FESOP 073-23632-00035.

**Appendix A: Emissions Calculations  
Corn Processing**

**Company Name: Monsanto Company**  
**Address City IN Zip: 15849 South US Highway 231, Remington, IN 47977**  
**FESOP: F 073-23632-00035**  
**Pit ID: 073-00035**  
**Reviewer: Michael A. Morrone**  
**Application Date: September 8, 2006**

Facility/Operation	Throughput (lb/hr)	Emission Factor* (lb/ton)	PM Emissions (uncontrolled) (ton/yr)	PM10 Emissions (uncontrolled) (ton/yr)	Efficiency of Control Device	PM Emissions (controlled) (ton/yr)	PM10 (controlled) Emissions (ton/yr)	Limited Corn Throughput (tons/yr)	Limited Emission Factor (lb/ton)	Limited PM Emissions (ton/yr)	Limited PM10 Emissions (ton/yr)
Corn Receiving 1 and 2	112000	PM = 0.035 PM10 = 0.0078	8.58	1.913	0.00%	8.58	1.913	70000	n/a	5.37	1.20
Huskers 1 and 2	112000	PM = 0.061 PM10 = 0.034	14.96	8.34	0.00%	14.96	8.34	70000	n/a	9.35	5.21
Ear Corn Dryer 2A	28000	PM = 0.47 PM10 = 0.12	28.8	7.36	0.00%	28.8	7.36	n/a	n/a	28.8	7.36
Ear Corn Dryer 2B	28000	PM = 0.47 PM10 = 0.12	28.8	7.36	0.00%	28.8	7.36	n/a	n/a	28.8	7.36
Ear Corn Dryer 3	28000	PM = 0.47 PM10 = 0.12	28.8	7.36	0.00%	28.8	7.36	n/a	n/a	28.8	7.36
Sheller <sup>1</sup>	112000	PM = 0.001 PM10 = 0.001	2.49	2.49	99.0%	0.025	0.025	n/a	n/a	2.49	2.49
Aspirators # 1 through # 3	56000	PM = 0.061 PM10 = 0.034	7.48	4.17	99.0%	0.075	0.042	n/a	n/a	7.48	4.17
Cleaners Lines 1 and 2 <sup>2</sup>	56000	PM = 0.375 PM10 = 0.22875	46.0	28.1	99.0%	0.995	0.603	122640	PM = 0.062 PM10 = 0.062	3.80	3.80
Sorters Lines #1 and #2	56000	PM = 0.375 PM10 = 0.22875	46.0	28.1				122640			
Sizers Lines #1 and 2	56000	PM = 0.061 PM10 = 0.034	7.48	4.17				122640			
Gravity Tables Line 1 and 2 <sup>3</sup>	56000	PM = 0.375 PM10 = 0.22875	46.0	28.1	99.0%	0.460	0.281	122640	PM = 0.269 PM10 = 0.269	16.5	16.5
Treaters #1 through #3	84000	PM = 0.061 PM10 = 0.034	11.2	6.25	99.0%	0.112	0.063	n/a	n/a	11.2	6.25
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12	134400	PM = 0.061 PM10 = 0.034	18.0	10.0	99.0%	0.180	0.100	294336	n/a	8.98	5.00
Rebagging #13	114800	PM = 0.061 PM10 = 0.034	15.3	8.55	99.0%	0.153	0.085	n/a	n/a	15.3	8.55
One small lot bagging operation, consisting of EU100 through EU104	198800	PM=0.061 PM=0.034	26.6	14.8	99.0%	0.266	0.148	744600	n/a	22.7	12.7
Debagger EU34	56000	PM = 0.061 PM10 = 0.034	7.48	4.17	99.0%	0.075	0.042	n/a	n/a	7.48	4.17
Debagger EU106	33600	PM = 0.061 PM10 = 0.034	4.49	2.50	99.0%	0.045	0.025	n/a	n/a	4.49	2.50
<b>TOTAL EMISSIONS</b>			<b>348</b>	<b>174</b>		<b>112</b>	<b>33.7</b>			<b>202</b>	<b>94.6</b>

**Methodology**

\*Efs from AP-42, Section 9.9.1.

PM and PM10 Emissions = Throughput, lb/hr \* ton/2000 lb \* Ef, lb/ton \* ton/2000 lb \* 8760 hr/yr

Limited PM and PM10 Emissions = Limited Throughput, lb/hr \* ton/2000 lb \* Limited Ef, lb/ton \* ton/2000 lb \* 8760 hr/yr

<sup>1</sup>Shelling PM Emissions = Baghouse CE-15 air flow rate, ft<sup>3</sup>/min \* cyclone grain loading, gr/ft<sup>3</sup> \* lb/7000gr \* ton/2000 lb \* 60 min/hr \* 8760 hr/yr = 5000 cufm/min \* 0.006 gr/cuft \* 1/7000 lb/gr \* 1/2000 lb/ton \* 60 min/hr \* 8760 hr/yr

<sup>2</sup>Grain Cleaner PM Emission Factor = 0.375 lb/ton PM, PM10 Emission Factor = 0.22875 lb/ton PM10, Baghouse Control Efficiency = 99%, as provided by the applicant.

<sup>3</sup>Gravity Tables PM Emission Factor = 0.375 lb/ton PM, PM10 Emission Factor = 0.22875 lb/ton PM10, Baghouse Control Efficiency = 99%, as provided by the applicant.

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

**Company Name: Monsanto Company  
Address City IN Zip: 15849 South US Highway 231, Remington, IN 47977  
FESOP: F 073-23632-00035  
Plt ID: 073-00035  
Reviewer: Michael A. Morrone  
Application Date: September 8, 2006**

**Unrestricted Potential Emissions**

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		

\*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined.  
\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Equipment	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission in tons/yr					
			PM*	PM10*	SO2	NOx	VOC	CO
One (1) natural gas-fired grain dryer, identified as Dry 2A	60.0	526	0.499	2.00	0.158	26.3	1.45	22.1
One (1) natural gas-fired grain dryer, identified as Dry 2B	60.0	526	0.499	2.00	0.158	26.3	1.45	22.1
<b>Total</b>	<b>120</b>	<b>1051</b>	<b>0.999</b>	<b>3.99</b>	<b>0.315</b>	<b>52.6</b>	<b>2.89</b>	<b>44.2</b>

**Methodology**

**Limited Potential Emissions**

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		

\*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined.  
\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Equipment	Heat Input Capacity MMBtu/hr	Limited Potential Throughput MMCF/yr	Potential Emission in tons/yr					
			PM*	PM10*	SO2	NOx	VOC	CO
One (1) natural gas-fired grain dryer, identified as Dry 2A	60.0	134	0.127	0.509	0.040	6.70	0.368	5.62
One (1) natural gas-fired grain dryer, identified as Dry 2B	60.0	134	0.127	0.509	0.040	6.70	0.368	5.62
<b>Total</b>	<b>120</b>	<b>268</b>	<b>0.254</b>	<b>1.02</b>	<b>0.080</b>	<b>13.4</b>	<b>0.737</b>	<b>11.2</b>

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  
Limited Potential Throughput = Heat Input Capacity (MMBtu/hr) \* 2,232 hrs/yr X 1MMCF/1,000 MMBtu  
Limited Emissions (tons/yr) = Limited Potential Throughput (MMCF/yr) X Emission Factor (lb/MMCF)/2,000 lb/ton  
See page 3 for HAPs emissions calculations.

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

**Company Name: Monsanto Company  
 Address City IN Zip: 15849 South US Highway 231, Remington, IN 47977  
 FESOP: F 073-23632-00035  
 Plt ID: 073-00035  
 Reviewer: Michael A. Morrone  
 Application Date: September 8, 2006**

**Two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.002	Dichlorobenzene 0.001	Formaldehyde 0.075	Hexane 1.80	Toluene 0.003
Potential Emission in tons/yr	0.001	0.001	0.039	0.946	0.002
Limited Potential Emission in tons/yr	0.0003	0.0002	0.010	0.241	0.0005

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.001	Cadmium 0.001	Chromium 0.001	Manganese 0.0004	Nickel 0.002	Total HAPs
Potential Emission in tons/yr	0.0003	0.001	0.001	0.0002	0.001	<b>0.992</b>
Limited Potential Emission in tons/yr	0.0001	0.0001	0.0002	0.0001	0.0003	<b>0.253</b>

Methodology is the same as page 2.

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: Emission Calculations  
Natural Gas Combustion Only  
MMBTU/HR >100**

**Company Name: Monsanto Company**  
**Address City IN Zip: 15849 South US Highway 231, Remington, IN 47977**  
**FESOP: F 073-23632-00035**  
**Plt ID: 073-00035**  
**Reviewer: Michael A. Morrone**  
**Application Date: September 8, 2006**

**One (1) natural gas-fired bin dryer, identified as Dry 3**

**Unrestricted Potential Emissions**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
160	1402

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	190 **see below	5.50	84.0
Potential Emission in tons/yr	1.33	5.33	0.420	133	3.85	58.9

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

\*\*Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100  
(See Table 1.4-1)

**Limited Potential Emissions**

Heat Input Capacity MMBtu/hr	Limited Potential Throughput MMCF/yr
160	357

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	190 **see below	5.50	84.0
Potential Emission in tons/yr	0.339	1.36	0.107	33.9	0.98	15.0

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

\*\*Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100  
(See Table 1.4-1)

**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 from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04  
(AP-42 Supplement D 3/98)

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

Limited Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 2,232 hrs/yr x 1 MMCF/1,000 MMBtu

Limited Emission (tons/yr) = Limited Potential Throughput (MMCF/year) \* Emission Factor (lb/MMCF)/2000 lb/ton

See page 5 for HAPs emissions calculations.

Natural Gas Combustion Only

MMBTU/HR >100

HAPs Emissions

**Company Name:** Monsanto Company  
**Address City IN ZIP:** 15849 South US Highway 231, Remington, IN 47977  
**Permit Number:** F 073-23632-00035  
**Plt ID:** 073-00035  
**Reviewer:** Michael A. Morrone  
**Application Date:** September 8, 2006

One (1) natural gas-fired bin dryer, identified as Dry 3

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	0.002	0.001	0.075	1.80	0.003
Potential Emission in tons/yr	0.001	0.001	0.053	1.26	0.002
Limited Potential Emissions in tons/yr	0.0004	0.0002	0.013	0.321	0.001

HAPs - Metals						
Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
	0.001	0.001	0.001	0.0004	0.002	
Potential Emission in tons/yr	0.0004	0.001	0.001	0.0003	0.001	<b>1.32</b>
Limited Potential Emissions in tons/yr	0.0001	0.0002	0.0002	0.0001	0.0004	<b>0.337</b>

Methodology is the same as page 4.

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  
Grain Storage Bins**

**Company Name: Monsanto Company**  
**Address City IN Zip: 15489 South US Highway 231, Remington, IN 47977**  
**FESOP: F 073-23632-00035**  
**Plt ID: 073-00035**  
**Reviewer: Michael A. Morrone**  
**Application Date: September 8, 2006**

Facility/Operation	Throughput (bushels/hour)	Emission Factor (lb/ton)	PM Emissions (ton/year)	PM10 Emissions (ton/year)
Bulk Storage Bins, identified as B-1 through B-17 and B-21 through B-72	1000	PM = 0.025 PM10 = .0063	3.06	0.772
12 Storage Bins, Line 1	500	PM = 0.025 PM10 = .0063	1.53	0.386
12 Storage Bins, Line 2	500	PM = 0.025 PM10 = .0063	1.53	0.386
Treating and Packing Storage Bins 1 through 12	1000	PM = 0.025 PM10 = .0063	3.06	0.772
<b>TOTAL EMISSIONS</b>			<b>9.19</b>	<b>2.32</b>

**Methodology**

AP-42, Chapter 9, Section 9, Tables 9.9.1-1 and 9.9.1-2

PM/PM-10 Emissions = Capacity, bushels/hr \* .02799 tons of grain/bushel \* Ef, lb/ton \* ton/2000 lb \* 8760 hrs/yr

**Appendix A: Emissions Calculations  
Summary**

**Company Name: Monsanto Company**  
**Address City IN Zip: 15489 South US Highway 231, Remington, IN 47977**  
**FESOP: F 073-23632-00035**  
**PI# ID: 073-00035**  
**Reviewer: Michael A. Morrone**  
**Application Date: September 8, 2006**

**Summary of Emissions**

**Uncontrolled Potential Emissions**

Significant Emission Units	PM (tons/yr)	PM-10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Lead (tons/yr)	Glycol Ether (tons/yr)	Benzene (tons/yr)	Dichlorobenzene (tons/yr)	Formaldehyde (tons/yr)	Hexane (tons/yr)	Toluene (tons/yr)	Cadmium (tons/yr)	Chromium (tons/yr)	Maganese (tons/yr)	Nickel (tons/yr)	Total HAPs (tons/yr)	
Corn Receiving 1 and 2, consisting of Huskers 1 and 2	23.5	10.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two natural gas-fired grain dryers, identified as Dry 2A and Dry 2B	58.6	18.7	0.315	52.6	2.89	44.2	0.0003	0.00	0.001	0.001	0.039	0.946	0.002	0.001	0.001	0.0002	0.001	0.001	0.992
One natural gas-fired grain dryer, identified as Dry 3	30.2	12.7	0.420	133.2	3.85	58.9	0.0004	0.00	0.001	0.001	0.053	1.26	0.002	0.001	0.001	0.0003	0.001	0.001	1.32
One corn sheller, identified as Sheller	2.49	2.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bulk storage bins, identified as B-1 through B-17 and B-21 through B-72	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12	18.0	10.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One rebagging unit, identified as 13	15.3	8.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One small lot bagging operation, consisting of EU102 through EU104	26.6	14.8	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) debagger, identified as EU34	7.48	4.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two corn handling lines, identified as Line 1 and Line 2, consisting of:																			
Two (2) cleaners, identified as Cleaners Line 1 and 2	46.0	28.1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two (2) sorters, identified as Sorters Line 1 and 2	46.0	28.1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two (2) sizers, identified as Sizers Line 1 and 2	7.48	4.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2	46.0	28.1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Twenty-Four (24) storage bins, identified as Storage Bins Lines 1 and 2	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Treating and Packing Machinery, consisting of:																			
Three (3) Aspirators, identified as Aspirators #1 through #3	7.48	4.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Three (3) treaters, identified as Treaters #1 through #3	11.22	6.25	0.00	0.00	48.5	0.00	0.00	0.621	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.621
Twelve (12) storage bins, identified as Treating and Packing Storage Bins 1 through 12	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) debagger, identified as EU106	4.49	2.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>360</b>	<b>185</b>	<b>0.736</b>	<b>186</b>	<b>55.2</b>	<b>103</b>	<b>0.001</b>	<b>0.621</b>	<b>0.003</b>	<b>0.001</b>	<b>0.092</b>	<b>2.21</b>	<b>0.004</b>	<b>0.001</b>	<b>0.002</b>	<b>0.0005</b>	<b>0.003</b>	<b>0.003</b>	<b>2.94</b>

**Appendix A: Emissions Calculations  
Summary**

**Company Name:** Monsanto Company  
**Address City IN Zip:** 15489 South US Highway 231, Remington, IN 47977  
**FESOP:** F 073-23632-00035  
**PI# ID:** 073-00035  
**Reviewer:** Michael A. Morrone  
**Application Date:** September 8, 2006

**Summary of Emissions**

**Controlled Potential Emissions**

<b>Significant Emission Units</b>	<b>PM</b>	<b>PM-10</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>Lead</b>	<b>Glycol Ether</b>	<b>Benzene</b>	<b>Dichlorobenzene</b>	<b>Formaldehyde</b>	<b>Hexane</b>	<b>Toluene</b>	<b>Cadmium</b>	<b>Chromium</b>	<b>Maganese</b>	<b>Nickel</b>	<b>Total HAPs</b>
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Corn Receiving 1 and 2, consisting of Huskers 1 and 2	23.5	10.3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two natural gas-fired grain dryers, identified as Dry 2A and Dry 2B	58.6	18.7	0.315	52.6	2.89	44.2	0.00	0.00	0.001	0.001	0.039	0.946	0.002	0.001	0.001	0.0002	0.001	0.992
One natural gas-fired grain dryer, identified as Dry 3	30.2	12.7	0.420	133	3.85	58.9	0.00	0.00	0.001	0.001	0.053	1.26	0.002	0.001	0.001	0.0003	0.001	1.32
One corn sheller, identified as Sheller	0.025	0.025	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bulk storage bins, identified as B-1 through B-17 and B-21 through B-72	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12	0.180	0.100	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One rebagging unit, identified as 13	0.153	0.085	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One small lot bagging operation, consisting of EU102 through EU104	0.266	0.148	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) debagger, identified as EU34	0.075	0.042	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Two corn handling lines, identified as Line 1 and Line 2, consisting of:</b>																		
Two (2) cleaners, identified as Cleaners Line 1 and 2	0.460	0.281	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two (2) sorters, identified as Sorters Line 1 and 2	0.460	0.281	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two (2) sizers, identified as Sizers Line 1 and 2	0.075	0.042	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2	0.460	0.281	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Twenty-Four (24) storage bins, identified as Storage Bins Lines 1 and 2	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Treating and Packing Machinery, consisting of:</b>																		
Three (3) Aspirators, identified as Aspirators #1 through #3	0.075	0.042	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Three (3) treaters, identified as Treaters #1 through #3	0.112	0.063	0.00	0.00	48.5	0.00	0.00	0.621	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.621
Twelve (12) storage bins, identified as Treating and Packing Storage Bins 1 through 12	3.065	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) debagger, identified as EU106	0.045	0.025	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>124</b>	<b>45.4</b>	<b>0.736</b>	<b>186</b>	<b>55.2</b>	<b>103</b>	<b>0.001</b>	<b>0.621</b>	<b>0.00</b>	<b>0.00</b>	<b>0.092</b>	<b>2.21</b>	<b>0.004</b>	<b>0.001</b>	<b>0.002</b>	<b>0.0005</b>	<b>0.003</b>	<b>2.94</b>

**Appendix A: Emissions Calculations  
Summary**

**Company Name:** Monsanto Company  
**Address City IN Zip:** 15489 South US Highway 231, Remington, IN 47977  
**FESOP:** F 073-23632-00035  
**PI# ID:** 073-00035  
**Reviewer:** Michael A. Morrone  
**Application Date:** September 8, 2006

**Summary of Emissions**

**Limited Potential Emissions**

Significant Emission Units	PM (tons/yr)	PM-10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Lead (tons/yr)	Glycol Ether (tons/yr)	Benzene (tons/yr)	Dichlorobenzene (tons/yr)	Formaldehyde (tons/yr)	Hexane (tons/yr)	Toluene (tons/yr)	Cadmium (tons/yr)	Chromium (tons/yr)	Maganese (tons/yr)	Nickel (tons/yr)	Total HAPs (tons/yr)	
Corn Receiving 1 and 2, consisting of Huskers 1 and 2	14.7	6.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two natural gas-fired grain dryers, identified as Dry 2A and Dry 2B	57.9	15.7	0.080	13.4	0.737	11.2	0.0001	0.00	0.0003	0.0002	0.0100	0.241	0.0005	0.0001	0.0002	0.0001	0.0003	0.0003	0.253
One natural gas-fired grain dry, identified as Dry 3	29.2	8.72	0.107	33.9	0.982	15.0	0.0001	0.00	0.0004	0.0002	0.0134	0.321	0.0006	0.0002	0.0002	0.0001	0.0004	0.0004	0.337
One corn sheller, identified as Sheller	2.49	2.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bulk storage bins, identified as B-1 through B-17 and B-21 through B-72	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12	8.98	5.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One rebagging unit, identified as 13	15.3	8.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One small lot bagging operation, consisting of EU102 through EU104	22.7	12.7	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) debagger, identified as EU34	7.48	4.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two corn handling lines, identified as Line 1 and Line 2, consisting of: Two (2) cleaners, identified as Cleaners Line 1 and 2 Two (2) sorters, identified as Sorters Line 1 and 2 Two (2) sizers, identified as Sizers Line 1 and 2	3.80	3.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2	16.5	16.5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Twenty-Four (24) storage bins, identified as Storage Bins Lines 1 and 2	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Treating and Packing Machinery, consisting of: Three (3) Aspirators, identified as Aspirators #1 through #3	7.48	4.17	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Three (3) treaters, identified as Treaters #1 through #3	11.22	6.25	0.000	0.000	Less than 25.0, each	0.000	0.000	0.621	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.621
Twelve (12) storage bins, identified as Treating and Packing Storage Bins 1 through 12	3.06	0.772	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
One (1) debagger, identified as EU106	4.49	2.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>211</b>	<b>99.3</b>	<b>0.187</b>	<b>47.3</b>	<b>Less than 76.7</b>	<b>26.2</b>	<b>0.0002</b>	<b>0.621</b>	<b>0.00</b>	<b>0.00</b>	<b>0.023</b>	<b>0.562</b>	<b>0.001</b>	<b>0.0003</b>	<b>0.0004</b>	<b>0.0001</b>	<b>0.001</b>	<b>0.001</b>	<b>1.21</b>

\*Note: Each treater is limited to less than 25.0 tons per year, but unrestricted potential to emit is only 48.2

**Appendix A: Emissions Calculations  
Corn Processing**

**Company Name: Monsanto Company**  
**Address City IN Zip: 15849 South US Highway 231, Remington, IN 47977**  
**FESOP: F 073-23632-00035**  
**Pit ID: 073-00035**  
**Reviewer: Michael A. Morrone**  
**Application Date: September 8, 2006**

Facility/Operation	Throughput (lb/hr)	Emission Factor* (lb/ton)	PM Emissions (uncontrolled) (ton/yr)	PM10 Emissions (uncontrolled) (ton/yr)	Efficiency of Control Device	PM Emissions (controlled) (ton/yr)	PM10 (controlled) Emissions (ton/yr)	Limited Corn Throughput (tons/yr)	Limited Emission Factor (lb/ton)	Limited PM Emissions (ton/yr)	Limited PM10 Emissions (ton/yr)
Corn Receiving 1 and 2	56000	PM = 0.035 PM10 = 0.0078	4.29	0.957	0.00%	4.29	0.957	n/a	n/a	4.29	0.96
Huskers 1 and 2	56000	PM = 0.061 PM10 = 0.034	7.48	4.17	0.00%	7.48	4.17	n/a	n/a	7.48	4.17
Ear Corn Dryer 2A	28000	PM = 0.47 PM10 = 0.12	28.8	7.36	0.00%	28.8	7.36	n/a	n/a	28.8	7.36
Ear Corn Dryer 2B	28000	PM = 0.47 PM10 = 0.12	28.8	7.36	0.00%	28.8	7.36	n/a	n/a	28.8	7.36
Ear Corn Dryer 3	28000	PM = 0.47 PM10 = 0.12	28.8	7.36	0.00%	28.8	7.36	n/a	n/a	28.8	7.36
Sheller <sup>1</sup>	112000	PM = 0.001 PM10 = 0.001	2.49	2.49	99.0%	0.025	0.025	n/a	n/a	2.49	2.49
Aspirators # 1 through # 3	56000	PM = 0.061 PM10 = 0.034	7.48	4.17	99.0%	0.075	0.042	n/a	n/a	7.48	4.17
Cleaners Lines 1 and 2 <sup>2</sup>	56000	PM = 0.375 PM10 = 0.22875	46.0	28.1	99.0%	0.995	0.603	122640	PM = 0.062 PM10 = 0.062	3.80	3.80
Sorters Lines #1 and #2	56000	PM = 0.375 PM10 = 0.22875	46.0	28.1				122640			
Sizers Lines #1 and 2	56000	PM = 0.061 PM10 = 0.034	7.48	4.17				122640			
Gravity Tables Line 1 and 2 <sup>3</sup>	56000	PM = 0.375 PM10 = 0.22875	46.0	28.1	99.0%	0.460	0.281	122640	PM = 0.269 PM10 = 0.269	16.5	16.5
Treaters #1 through #3	84000	PM = 0.061 PM10 = 0.034	11.2	6.25	99.0%	0.112	0.063	n/a	n/a	11.2	6.25
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12	134400	PM = 0.061 PM10 = 0.034	18.0	10.0	99.0%	0.180	0.100	294336	n/a	8.98	5.00
Rebagging #13	114800	PM = 0.061 PM10 = 0.034	15.3	8.55	99.0%	0.153	0.085	n/a	n/a	15.3	8.55
One small lot bagging operation, consisting of EU100 through EU104	198800	PM=0.061 PM=0.034	26.6	14.8	99.0%	0.266	0.148	744600	n/a	22.7	12.7
Debagger EU34	56000	PM = 0.061 PM10 = 0.034	7.48	4.17	99.0%	0.075	0.042	n/a	n/a	7.48	4.17
Debagger EU106	33600	PM = 0.061 PM10 = 0.034	4.49	2.50	99.0%	0.045	0.025	n/a	n/a	4.49	2.50
<b>TOTAL EMISSIONS</b>			<b>337</b>	<b>168</b>		<b>101</b>	<b>28.6</b>			<b>199</b>	<b>93.3</b>

**Methodology**

\*Efs from AP-42, Section 9.9.1.

PM and PM10 Emissions = Throughput, lb/hr \* ton/2000 lb \* Ef, lb/ton \* ton/2000 lb \* 8760 hr/yr

Limited PM and PM10 Emissions = Limited Throughput, lb/hr \* ton/2000 lb \* Limited Ef, lb/ton \* ton/2000 lb \* 8760 hr/yr

<sup>1</sup>Shelling PM Emissions = Baghouse CE-15 air flow rate, ft<sup>3</sup>/min \* cyclone grain loading, gr/ft<sup>3</sup> \* lb/7000gr \* ton/2000 lb \* 60 min/hr \* 8760 hr/yr = 5000 cufm/min \* 0.006 gr/cuft \* 1/7000 lb/gr \* 1/2000 lb/ton \* 60 min/hr \* 8760 hr/yr

<sup>2</sup>Grain Cleaner PM Emission Factor = 0.375 lb/ton PM, PM10 Emission Factor = 0.22875 lb/ton PM10, Baghouse Control Efficiency = 99%, as provided by the applicant.

<sup>3</sup>Gravity Tables PM Emission Factor = 0.375 lb/ton PM, PM10 Emission Factor = 0.22875 lb/ton PM10, Baghouse Control Efficiency = 99%, as provided by the applicant.

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

**Company Name: Monsanto Company  
Address City IN Zip: 15849 South US Highway 231, Remington, IN 47977  
FESOP: F 073-23632-00035  
Plt ID: 073-00035  
Reviewer: Michael A. Morrone  
Application Date: September 8, 2006**

**Unrestricted Potential Emissions**

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		

\*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined.  
\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Equipment	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission in tons/yr					
			PM*	PM10*	SO2	NOx	VOC	CO
One (1) natural gas-fired grain dryer, identified as Dry 2A	60.0	526	0.499	2.00	0.158	26.3	1.45	22.1
One (1) natural gas-fired grain dryer, identified as Dry 2B	60.0	526	0.499	2.00	0.158	26.3	1.45	22.1
<b>Total</b>	<b>120</b>	<b>1051</b>	<b>0.999</b>	<b>3.99</b>	<b>0.315</b>	<b>52.6</b>	<b>2.89</b>	<b>44.2</b>

**Methodology**

**Limited Potential Emissions**

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		

\*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined.  
\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Equipment	Heat Input Capacity MMBtu/hr	Limited Potential Throughput MMCF/yr	Potential Emission in tons/yr					
			PM*	PM10*	SO2	NOx	VOC	CO
One (1) natural gas-fired grain dryer, identified as Dry 2A	60.0	134	0.127	0.509	0.040	6.70	0.368	5.62
One (1) natural gas-fired grain dryer, identified as Dry 2B	60.0	134	0.127	0.509	0.040	6.70	0.368	5.62
<b>Total</b>	<b>120</b>	<b>268</b>	<b>0.254</b>	<b>1.02</b>	<b>0.080</b>	<b>13.4</b>	<b>0.737</b>	<b>11.2</b>

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  
Limited Potential Throughput = Heat Input Capacity (MMBtu/hr) \* 2,232 hrs/yr X 1MMCF/1,000 MMBtu  
Limited Emissions (tons/yr) = Limited Potential Throughput (MMCF/yr) X Emission Factor (lb/MMCF)/2,000 lb/ton  
See page 3 for HAPs emissions calculations.

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

**Company Name: Monsanto Company  
 Address City IN Zip: 15849 South US Highway 231, Remington, IN 47977  
 FESOP: F 073-23632-00035  
 Plt ID: 073-00035  
 Reviewer: Michael A. Morrone  
 Application Date: September 8, 2006**

Two (2) natural gas-fired bin dryers, identified as Dry 2A and Dry 2B

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.002	Dichlorobenzene 0.001	Formaldehyde 0.075	Hexane 1.80	Toluene 0.003
Potential Emission in tons/yr	0.001	0.001	0.039	0.946	0.002
Limited Potential Emission in tons/yr	0.0003	0.0002	0.010	0.241	0.0005

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.001	Cadmium 0.001	Chromium 0.001	Manganese 0.0004	Nickel 0.002	Total HAPs
Potential Emission in tons/yr	0.0003	0.001	0.001	0.0002	0.001	<b>0.992</b>
Limited Potential Emission in tons/yr	0.0001	0.0001	0.0002	0.0001	0.0003	<b>0.253</b>

Methodology is the same as page 2.

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: Emission Calculations  
Natural Gas Combustion Only  
MMBTU/HR >100**

**Company Name: Monsanto Company**  
**Address City IN Zip: 15849 South US Highway 231, Remington, IN 47977**  
**FESOP: F 073-23632-00035**  
**Plt ID: 073-00035**  
**Reviewer: Michael A. Morrone**  
**Application Date: September 8, 2006**

**One (1) natural gas-fired bin dryer, identified as Dry 3**

**Unrestricted Potential Emissions**

Heat Input Capacity                      Potential Throughput  
MMBtu/hr                                      MMCF/yr

160

1402

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
1.90	7.60	0.600	190	5.50	84.0	
			**see below			
Potential Emission in tons/yr	1.33	5.33	0.420	133	3.85	58.9

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

\*\*Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100  
(See Table 1.4-1)

**Limited Potential Emissions**

Heat Input Capacity                      Limited Potential Throughput  
MMBtu/hr                                      MMCF/yr

160

357

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
1.90	7.60	0.600	190	5.50	84.0	
			**see below			
Potential Emission in tons/yr	0.339	1.36	0.107	33.9	0.98	15.0

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

\*\*Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100  
(See Table 1.4-1)

**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 from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04  
(AP-42 Supplement D 3/98)

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

Limited Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 2,232 hrs/yr x 1 MMCF/1,000 MMBtu

Limited Emission (tons/yr) = Limited Potential Throughput (MMCF/year) \* Emission Factor (lb/MMCF)/2000 lb/ton

See page 5 for HAPs emissions calculations.

**Appendix A: Emission Calculations**  
**Natural Gas Combustion Only**  
**MMBTU/HR >100**  
**HAPs Emissions**

**Company Name: Monsanto Company**  
**Address City IN ZIP: 15849 South US Highway 231, Remington, IN 47977**  
**Permit Number: F 073-23632-00035**  
**Plt ID: 073-00035**  
**Reviewer: Michael A. Morrone**  
**Application Date: September 8, 2006**

One (1) natural gas-fired bin dryer, identified as Dry 3

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	0.002	0.001	0.075	1.80	0.003
Potential Emission in tons/yr	0.001	0.001	0.053	1.26	0.002
Limited Potential Emissions in tons/yr	0.0004	0.0002	0.013	0.321	0.001

HAPs - Metals						
Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
	0.001	0.001	0.001	0.0004	0.002	
Potential Emission in tons/yr	0.0004	0.001	0.001	0.0003	0.001	<b>1.32</b>
Limited Potential Emissions in tons/yr	0.0001	0.0002	0.0002	0.0001	0.0004	<b>0.337</b>

Methodology is the same as page 4.

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  
Grain Storage Bins**

**Company Name: Monsanto Company**  
**Address City IN Zip: 15489 South US Highway 231, Remington, IN 47977**  
**FESOP: F 073-23632-00035**  
**Plt ID: 073-00035**  
**Reviewer: Michael A. Morrone**  
**Application Date: September 8, 2006**

Facility/Operation	Throughput (bushels/hour)	Emission Factor (lb/ton)	PM Emissions (ton/year)	PM10 Emissions (ton/year)
Bulk Storage Bins, identified as B-1 through B-17 and B-21 through B-72	1000	PM = 0.025 PM10 = .0063	3.06	0.772
12 Storage Bins, Line 1	500	PM = 0.025 PM10 = .0063	1.53	0.386
12 Storage Bins, Line 2	500	PM = 0.025 PM10 = .0063	1.53	0.386
Treating and Packing Storage Bins 1 through 12	1000	PM = 0.025 PM10 = .0063	3.06	0.772
<b>TOTAL EMISSIONS</b>			<b>9.19</b>	<b>2.32</b>

**Methodology**

AP-42, Chapter 9, Section 9, Tables 9.9.1-1 and 9.9.1-2

PM/PM-10 Emissions = Capacity, bushels/hr \* .02799 tons of grain/bushel \* Ef, lb/ton \* ton/2000 lb \* 8760 hrs/yr

**Appendix A: Emissions Calculations  
Summary**

**Company Name:** Monsanto Company  
**Address City IN Zip:** 15489 South US Highway 231, Remington, IN 47977  
**FESOP:** F 073-23632-00035  
**PI# ID:** 073-00035  
**Reviewer:** Michael A. Morrone  
**Application Date:** September 8, 2006

**Summary of Emissions**

**Uncontrolled Potential Emissions**

<b>Significant Emission Units</b>	<b>PM</b> (tons/yr)	<b>PM-10</b> (tons/yr)	<b>SO2</b> (tons/yr)	<b>NOx</b> (tons/yr)	<b>VOC</b> (tons/yr)	<b>CO</b> (tons/yr)	<b>Lead</b> (tons/yr)	<b>Glycol Ether</b> (tons/yr)	<b>Benzene</b> (tons/yr)	<b>Dichlorobenzene</b> (tons/yr)	<b>Formaldehyde</b> (tons/yr)	<b>Hexane</b> (tons/yr)	<b>Toluene</b> (tons/yr)	<b>Cadmium</b> (tons/yr)	<b>Chromium</b> (tons/yr)	<b>Manganese</b> (tons/yr)	<b>Nickel</b> (tons/yr)	<b>Total HAPs</b> (tons/yr)
Corn Receiving 1 and 2, consisting of Huskers 1 and 2	11.8	5.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two natural gas-fired grain dryers, identified as Dry 2A and Dry 2B	58.6	18.7	0.315	52.6	2.89	44.2	0.0003	0.00	0.001	0.001	0.039	0.946	0.002	0.001	0.001	0.0002	0.001	0.992
One natural gas-fired grain dryer, identified as Dry 3	30.2	12.7	0.420	133.2	3.85	58.9	0.0004	0.00	0.001	0.001	0.053	1.26	0.002	0.001	0.001	0.0003	0.001	1.32
One corn sheller, identified as Sheller	2.49	2.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bulk storage bins, identified as B-1 through B-17 and B-21 through B-72	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12	18.0	10.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One rebagging unit, identified as 13	15.3	8.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One small lot bagging operation, consisting of EU102 through EU104	26.6	14.8	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) debagger, identified as EU34	7.48	4.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two corn handling lines, identified as Line 1 and Line 2, consisting of:																		
Two (2) cleaners, identified as Cleaners Line 1 and 2	46.0	28.1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two (2) sorters, identified as Sorters Line 1 and 2	46.0	28.1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two (2) sizers, identified as Sizers Line 1 and 2	7.48	4.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2	46.0	28.1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Twenty-Four (24) storage bins, identified as Storage Bins Lines 1 and 2	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Treating and Packing Machinery, consisting of:																		
Three (3) Aspirators, identified as Aspirators #1 through #3	7.48	4.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Three (3) treaters, identified as Treaters #1 through #3	11.22	6.25	0.00	0.00	48.5	0.00	0.00	0.621	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.621
Twelve (12) storage bins, identified as Treating and Packing Storage Bins 1 through 12	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) debagger, identified as EU106	4.49	2.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>348</b>	<b>180</b>	<b>0.736</b>	<b>186</b>	<b>55.2</b>	<b>103</b>	<b>0.001</b>	<b>0.621</b>	<b>0.003</b>	<b>0.001</b>	<b>0.092</b>	<b>2.21</b>	<b>0.004</b>	<b>0.001</b>	<b>0.002</b>	<b>0.0005</b>	<b>0.003</b>	<b>2.94</b>

**Appendix A: Emissions Calculations  
Summary**

**Company Name: Monsanto Company**  
**Address City IN Zip: 15489 South US Highway 231, Remington, IN 47977**  
**FESOP: F 073-23632-00035**  
**PI# ID: 073-00035**  
**Reviewer: Michael A. Morrone**  
**Application Date: September 8, 2006**

**Summary of Emissions**

**Controlled Potential Emissions**

<b>Significant Emission Units</b>	<b>PM</b>	<b>PM-10</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>Lead</b>	<b>Glycol Ether</b>	<b>Benzene</b>	<b>Dichlorobenzene</b>	<b>Formaldehyde</b>	<b>Hexane</b>	<b>Toluene</b>	<b>Cadmium</b>	<b>Chromium</b>	<b>Maganese</b>	<b>Nickel</b>	<b>Total HAPs</b>
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Corn Receiving 1 and 2, consisting of Huskers 1 and 2	11.8	5.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two natural gas-fired grain dryers, identified as Dry 2A and Dry 2B	58.6	18.7	0.315	52.6	2.89	44.2	0.00	0.00	0.001	0.001	0.039	0.946	0.002	0.001	0.001	0.0002	0.001	0.992
One natural gas-fired grain dryer, identified as Dry 3	30.2	12.7	0.420	133	3.85	58.9	0.00	0.00	0.001	0.001	0.053	1.26	0.002	0.001	0.001	0.0003	0.001	1.32
One corn sheller, identified as Sheller	0.025	0.025	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bulk storage bins, identified as B-1 through B-17 and B-21 through B-72	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12	0.180	0.100	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One rebagging unit, identified as 13	0.153	0.085	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One small lot bagging operation, consisting of EU102 through EU104	0.266	0.148	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) debagger, identified as EU34	0.075	0.042	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Two corn handling lines, identified as Line 1 and Line 2, consisting of:</b>																		
Two (2) cleaners, identified as Cleaners Line 1 and 2	0.460	0.281	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two (2) sorters, identified as Sorters Line 1 and 2	0.460	0.281	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two (2) sizers, identified as Sizers Line 1 and 2	0.075	0.042	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2	0.460	0.281	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Twenty-Four (24) storage bins, identified as Storage Bins Lines 1 and 2	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Treating and Packing Machinery, consisting of:</b>																		
Three (3) Aspirators, identified as Aspirators #1 through #3	0.075	0.042	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Three (3) treaters, identified as Treaters #1 through #3	0.112	0.063	0.00	0.00	48.5	0.00	0.00	0.621	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.621
Twelve (12) storage bins, identified as Treating and Packing Storage Bins 1 through 12	3.065	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) debagger, identified as EU106	0.045	0.025	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>112</b>	<b>40.3</b>	<b>0.736</b>	<b>186</b>	<b>55.2</b>	<b>103</b>	<b>0.001</b>	<b>0.621</b>	<b>0.00</b>	<b>0.00</b>	<b>0.092</b>	<b>2.21</b>	<b>0.004</b>	<b>0.001</b>	<b>0.002</b>	<b>0.0005</b>	<b>0.003</b>	<b>2.94</b>

**Appendix A: Emissions Calculations  
Summary**

**Company Name:** Monsanto Company  
**Address City IN Zip:** 15489 South US Highway 231, Remington, IN 47977  
**FESOP:** F 073-23632-00035  
**PI# ID:** 073-00035  
**Reviewer:** Michael A. Morrone  
**Application Date:** September 8, 2006

**Summary of Emissions**

**Limited Potential Emissions**

Significant Emission Units	PM (tons/yr)	PM-10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Lead (tons/yr)	Glycol Ether (tons/yr)	Benzene (tons/yr)	Dichlorobenzene (tons/yr)	Formaldehyde (tons/yr)	Hexane (tons/yr)	Toluene (tons/yr)	Cadmium (tons/yr)	Chromium (tons/yr)	Maganese (tons/yr)	Nickel (tons/yr)	Total HAPs (tons/yr)	
Corn Receiving 1 and 2, consisting of Huskers 1 and 2	11.8	5.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two natural gas-fired grain dryers, identified as Dry 2A and Dry 2B	57.9	15.7	0.080	13.4	0.737	11.2	0.0001	0.00	0.0003	0.0002	0.0100	0.241	0.0005	0.0001	0.0002	0.0001	0.0003	0.0003	0.253
One natural gas-fired grain dry, identified as Dry 3	29.2	8.72	0.107	33.9	0.982	15.0	0.0001	0.00	0.0004	0.0002	0.0134	0.321	0.0006	0.0002	0.0002	0.0001	0.0004	0.0004	0.337
One corn sheller, identified as Sheller	2.49	2.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bulk storage bins, identified as B-1 through B-17 and B-21 through B-72	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) bagging unit, identified as EU100, one (1) seed pack fill unit, identified as EU101, one (1) manual seed pack unit, identified as EU105, and one (1) bagging machine, identified as EU12	8.98	5.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One rebagging unit, identified as 13	15.3	8.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One small lot bagging operation, consisting of EU102 through EU104	22.7	12.7	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) debagger, identified as EU34	7.48	4.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two corn handling lines, identified as Line 1 and Line 2, consisting of: Two (2) cleaners, identified as Cleaners Line 1 and 2 Two (2) sorters, identified as Sorters Line 1 and 2 Two (2) sizers, identified as Sizers Line 1 and 2	3.80	3.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2	16.5	16.5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Twenty-Four (24) storage bins, identified as Storage Bins Lines 1 and 2	3.06	0.772	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Treating and Packing Machinery, consisting of: Three (3) Aspirators, identified as Aspirators #1 through #3	7.48	4.17	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Three (3) treaters, identified as Treaters #1 through #3	11.22	6.25	0.000	0.000	Less than 25.0, each	0.000	0.000	0.621	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.621
Twelve (12) storage bins, identified as Treating and Packing Storage Bins 1 through 12	3.06	0.772	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
One (1) debagger, identified as EU106	4.49	2.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>209</b>	<b>98.0</b>	<b>0.187</b>	<b>47.3</b>	<b>Less than 76.7</b>	<b>26.2</b>	<b>0.0002</b>	<b>0.621</b>	<b>0.00</b>	<b>0.00</b>	<b>0.023</b>	<b>0.562</b>	<b>0.001</b>	<b>0.0003</b>	<b>0.0004</b>	<b>0.0001</b>	<b>0.001</b>	<b>0.001</b>	<b>1.21</b>

\*Note: Each treater is limited to less than 25.0 tons per year, but unrestricted potential to emit is only 48.2

Mail to: Permit Administration & Development Section  
Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

Monsanto Company  
P.O. Box 35  
Remington, Indiana 47977

**Affidavit of Construction**

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)

3. By virtue of my position with \_\_\_\_\_, I have personal knowledge of the  
(Company Name)  
representations contained in this affidavit and am authorized to make these representations on behalf of  
\_\_\_\_\_.  
(Company Name)

4. I hereby certify that Monsanto Company, 15489 South US Highway 231, Remington, Indiana 47977, completed construction of the one (1) natural gas-fired bin dryer, identified as Dry 3, one (1) corn sheller, identified as Sheller, two (2) corn handling lines, identified as Line 1 and Line 2, new treating/packing machinery on \_\_\_\_\_ in conformity with the requirements and intent of the Federally Enforceable State Operating Permit (FESOP) application received by the Office of Air Quality on September 8, 2006 and as permitted pursuant to **FESOP No. F 073-23632, Plant ID No. F 073-00035** issued on \_\_\_\_\_.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.

My Commission expires: \_\_\_\_\_.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name (typed or printed)