INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

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 11, 2011

RE: Cargill, Inc. / 097-24945-00020

FROM: Matthew Stuckey, Deputy Branch 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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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
FNTVOP.dot12/3/07

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Cargill, Inc.
1730 West Michigan Street
Indianapolis, Indiana 46222-3898

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T097-24945-00020	
Issued by: Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: February 11, 2011 Expiration Date: February 11, 2016

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary dry corn milling and processing plant.

Source Address:	1730 West Michigan Street, Indianapolis, IN, Indiana 46222-3898
General Source Phone Number:	317-632-1481
SIC Code:	2041
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) Cleaver Brooks Boiler #1 identified as EU #19, installed in 1972, has a rated heat input capacity of 33.5 million Btu per hour. The boiler combusts primarily natural gas and has No. 2 fuel oil as a backup capability and exhausting at S/V 1.

(b) Grain receiving operations, identified as D-20. Installed in 1974. The grain receiving operation has a maximum throughput capacity of 200 tons of grain per hour, and is controlled by a baghouse, exhausting at one (1) stack, identified as S/V 8.

(c) Two (2) grain elevator headhouses, identified as D-11 and D-14. Installed in 1974. Each headhouse has a maximum throughput capacity of 200 tons of grain per hour, and each has cyclone control. Each exhausts at one (1) stack, identified as S/V 5 and 6, respectively.

(d) New mill drying and cooling operations, identified as D-6 (New Mill Dryer), D-7 (New Mill Dryer), D-8 (New Mill Cooler) and D-15 (Oil Mill Dust System). Installed in 1974. D-6 and D-7 each have a maximum throughput capacity of 25 tons per hour. D-8 has a maximum throughput capacity of 50 tons per hour. D-15 has a maximum throughput capacity of 1.5 tons per hour. Each of these processes is controlled by two cyclones in series. Each operation D-6, D-7, D-8 and D-15 exhaust out one (1) stack identified as S/V identification 2, 3, 4 and 7, respectively. The primary cyclone for each process is considered integral to the process.

(e) Masa corn products drying operations, identified as D-15A (Masa “A” System) and D-15B (Masa “B” System). Installed in 1992. D-15A and D-15B each have a maximum throughput capacity of 6.5 tons per hour. Each of these processes is controlled by two cyclones in series. Each operation exhausts out one (1) stack identified as S/V 7A and 7B,

respectively. The primary cyclone for each process is considered integral to the process.

(f) Two (2) grading systems: Grading system A, with pneumatic conveyance system exhausts identified as D-21, D-22, and D-23, and Grading system B, with pneumatic conveyance system exhausts identified as D-24, D-25, and D-26. Installed in 1974. Grading systems A and B each have a combined maximum throughput capacity of 30 tons of grain per hour. Each pneumatic conveyance system exhaust is equipped with one (1) stack, identified, as S/V 9, 10, and 11, respectively for grading system A, and S/V 12, 13, and 14, respectively for grading System B. Each exhaust has baghouse control.

(g) Germ Recovery System, identified as D-30 and D-31. Installed in 1974. Each recovery system has a maximum throughput capacity of 2.5 tons per hour and equipped with common baghouse control exhausting through two (2) stacks identified as S/V 17 and 18.

(h One (1) Finished Products System, identified as D-37. Installed in 1974. The finished products system has a maximum throughput capacity of 33 tons of corn products per hour, and is equipped with baghouse control, exhausting through a single stack, identified as S/V 24.

(i) Masa Hammermill Dust System identified as D-50. Installed in 1999. The Masa Hammermill Dust System consists of two (2) hammermills with a combined maximum throughput capacity of 15.0 tons per hour and is equipped with a baghouse exhausting at S/V D-50.

(j) 9^{th} Floor Filter Reroute, identified as D-52. Installed in 1999. This process has a maximum throughput capacity of 4.5 tons per hour and is controlled by a baghouse exhausting at S/V D-52.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

(a) One (1) Feed Hammermill Lift system, identified as D-27. Installed in 1974. The feed hammermill has a maximum throughput capacity of 28 tons of corn products per hour, and exhausts through three (3) baghouses to a single stack, identified as S/V 27. These baghouse are considered integral to the process. [326 IAC 6.5-1-2(a)]

(b) Reduction System A, identified as D-28 and Reduction System B, identified as D-29. Installed in 1974. Each system is rated at a maximum throughput capacity of 12.5 tons per hour and exhausts through a baghouse considered integral to the process and to, respectively, S/V 15 and Stack/Vent 16. [326 IAC 6.5-1-2(a)]

(c) Coarse Grit Receiver, identified as D-32 and Brewers Grit Receiver, identified as D-33. Installed in 1974. Each is rated at a maximum throughput capacity of 6.25 tons per hour and exhausts through a baghouse integral to the process and to, respectively, S/V 19 and S/V 20. [326 IAC 6.5-1-2(a)]

(d) Two (2) Flour Receivers, identified as D-34 and D-35, one (1) Granulated Meal Receiver, identified as D-36 and one (1) Soft Meal Receiver, identified as D-38. Installed in 1974. Each is rated at a maximum throughput capacity of 5.0 tons per hour and exhausts through a baghouse integral to the process and to, respectively, S/V 21, 22, 23 and 25. [326 IAC 6.5-1-2(a)]

(e) Reduction systems A and B blowers, identified as D-39. Installed in 1974. The reduction systems A and B have a maximum throughput capacity of 12 tons of corn products per hour, and are equipped with baghouse control, exhausting through a single stack, identified as S/V 26. This baghouse is considered integral to the process. [326 IAC 6.5-1-2(a)]

(f) Germ Recovery System Blower identified as D-40 and rated at a maximum throughput capacity of 6.0 tons per hour and exhausting through a baghouse integral to the process and to S/V 45. Installed in 1974. [326 IAC 6.5-1-2(a)]

(g) Two (2) Germ Recovery System Feed Blowers, identified as D-41 and D-42 each with a maximum throughput capacity of 8.0 tons per hour and each system exhausts through four (4) baghouses in parallel and integral to the process and exhausting, respectively, through S/V 28 and 29. Installed in 1974. [326 IAC 6.5-1-2(a)]

(h) Joshi Dryer identified as D-54 with a maximum throughput capacity of 2.0 tons per hour and exhausting through one (1) baghouse integral to the process and to S/V D-54. Installed in 1997. [326 IAC 6.5-1-2(a)]

(i) Joshi Dry Product Transfer Exhaust, identified as D-55. Installed in 1997. This process is controlled by a baghouse and has a maximum throughput capacity of 2.0 tons per hour. This baghouse is considered integral to the process and exhausts to S/V D-55. [326 IAC 6.5-1-2(a)]

(j) Railcar Load Out and Bulk Packaging of finished products, identified as D-43 (Flour Loadout), D-44 (Yellow Goods Loadout-Course Grit), 44a (Yellow Goods Loadout-Course Grit), 45 (Yellow Goods Loadout-Flaking Grits), 46 (Yellow Goods Loadout-Brewer's Grit), and 46A (Yellow Goods Loadout-Granulated Meal/Cones). Installed in 1974. Flour load out and yellow goods loadout are controlled by spout extensions and loadout enclosures only. General aspiration of all air from this process exhausts to a baghouse. The D-43 operations have maximum throughput capacity of 25 tons per hour and D-44, 44a, 45, 46 and 46a operations have a combined maximum throughput capacity of 26 tons per hour. [326 IAC 6.5-1-2(a)]

(k) Finished Products Shipping and Handling Operations, including feed loadout, identified as D-47. Installed in 1974. Feed loadout is controlled by a spout extension only. The operations have maximum throughput capacity of 60 tons per hour. [326 IAC 6.5-1-2(a)]

(l) One (1) product loadout spout # 4, identified as D-56. Installed in 1974. Feed loadout is controlled by a spout extension only. The operations have maximum throughput capacity of 60 tons per hour. [326 IAC 6.5-1-2(a)]

(m) Corn Aspiration identified as D-48 and controlled by a baghouse exhausting less than 4000 acfm at S/V D-48. Installed in 1995. [326 IAC 6.5-1-2(a)]

(n) Masa Cooker Steam Ventilation Unit identified as D-49 and controlled by a cyclone exhausting at S/V D-49. Installed in 1996. [326 IAC 6.5-1-2(a)]

(o) Raw Bran Bin Dust Filter identified as D-53 and controlled by a baghouse exhausting at S/V D-53. Installed in 1997. [326 IAC 6.5-1-2(a)]

(p) Natural gas-fired heaters each rated at less than 10 million Btu per hour, installed in 1974, as follows [326 IAC 6.5-1-2(a)]:

(1) maintenance office furnace rated at 0.075 MMBtu/hr;

(2) 2nd floor administrative bldg furnace rated at 0.132 MMBtu/hr;

(3) two (2) 1st floor administrative bldg furnaces rated at 0.100 MMBtu/hr; and

(4) R&D Kitchen space heater rated at 0.05 MMBtu/hr.

(q) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, installed in 1974, as follows: [326 IAC 6.5-1-2(a)]

(1) one (1) gasoline power washer, <5hp.

(r) Brazing equipment, cutting torches, soldering equipment, and welding equipment, , installed in 1974, not resulting in the emission of HAPs; [326 IAC 6.5-1-2(a)]

(1) cutting torches used by maintenance (acetylene-oxygen type);

(2) electric welding equipment; and

(3) electric small-scale soldering irons used as necessary.

(s) Cleaners and solvents having a vapor pressure equal to or less than 2 kiloPascals measured at 38 degrees Celsius (100 degrees Fahrenheit) or having a vapor pressure equal to or less than 0.7 kiloPascals measured at 20 degrees Celsius, the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months, installed in 1974. [326 IAC 8-3-5(a) & (b)]

(t) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4] [326 IAC 6-5]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T097-24945-00020, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(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 2-7-5(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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(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.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

(c) 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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(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.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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 and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-7-5(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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-4(c)(9) 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 2-7 and any other applicable rules.

(g) 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.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T097-24945-00020 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-9(a)(3)]

(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 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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 2-7-4. 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) 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 preconstruction approval required by 326 IAC 2-7-10.5 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). 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 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 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 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 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 substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 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 thirty percent (30%) 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.2 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.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

(f) 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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
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no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [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.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

(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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

(c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

(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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
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(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) 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.

(e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
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(g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.18 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 applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Cleaver Brooks Boiler #1 identified as EU #19, installed in 1972, has a rated heat input capacity of 33.5 million Btu per hour. The boiler combusts primarily natural gas and has No. 2 fuel oil as a backup capability and exhausting at S/V 1.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter Limitations: Marion County [326 IAC 6.5-6]

Pursuant to 326 IAC 6.5-6 (Particulate Matter Limitations: Marion County), particulate matter (PM) emissions from the Cleaver Brooks Boiler #1 identified as EU #19 are limited to 0.014 pounds per million Btu and 1.0 tons per year.

D.1.2 Fuel Usage Limitation [326 IAC 6.5-6]

(a) Natural Gas combustion (by itself with no other fuel burned) in Cleaver Brooks Boiler #1 (EU #19) shall not exceed 263.15 million cubic feet per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) Distillate Fuel combustion (by itself with no other fuel burned) in Cleaver Brooks Boiler #1 (EU #19) shall not exceed 1000 kgal per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) For the purposes of determining compliance, every 1000 gallons (1 kgal) of distillate fuel consumption is equivalent to 0.26 million cubic feet of natural gas consumption based on PM emissions.

D.1.3 Sulfur Dioxide [326 IAC 7-1.1][326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from EU #19 shall not exceed five tenths (0.5) pounds per million Btu heat input for distillate oil combustion. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for this facility and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3-7-4]

The compliance status with Condition D.1.3 shall be determined utilizing one of the following options:

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths percent (0.5) pounds per million Btu heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Visible Emissions Notations

(a) Visible emission notations of Cleaver Brooks Boiler #1 (S/V 1) exhaust shall be performed once per day during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) below shall be complete and sufficient to establish compliance with the SO_2 emission limit established in Condition D.1.3.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since the last compliance determination period and equivalent sulfur dioxide emissions;

(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

(b) To document the compliance status with Condition D.1.2, the Permittee shall maintain records of monthly and twelve (12) consecutive month sum of natural gas consumption and/or natural gas equivalents for EU #19 (Boiler # 1).

(c) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of visible emission notations from S/V 1 exhausts once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the boiler did not operate that day).

(d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required to be maintained by this condition.

D.1.8 Reporting Requirements

(a) The natural gas boiler certification shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The natural gas-fired boiler certification does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A quarterly summary of the information to document the compliance status with Condition D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) Grain receiving operations, identified as D-20. Installed in 1974. The grain receiving operation has a maximum throughput capacity of 200 tons of grain per hour, and is controlled by a baghouse, exhausting at one (1) stack, identified as S/V 8.

(c) Two (2) grain elevator headhouses, identified as D-11 and D-14. Installed in 1974. Each headhouse has a maximum throughput capacity of 200 tons of grain per hour, and each has cyclone control. Each exhausts at one (1) stack, identified as S/V 5 and 6, respectively.

(d) New mill drying and cooling operations, identified as D-6 (New Mill Dryer), D-7 (New Mill Dryer), D-8 (New Mill Cooler) and D-15 (Oil Mill Dust System). Installed in 1974. D-6 and D-7 each have a maximum throughput capacity of 25 tons per hour. D-8 has a maximum throughput capacity of 50 tons per hour. D-15 has a maximum throughput capacity of 1.5 tons per hour. Each of these processes is controlled by two cyclones in series. Each operation D-6, D-7, D-8 and D-15 exhaust out one (1) stack identified as S/V identification 2, 3, 4 and 7, respectively. The primary cyclone for each process is considered integral to the process.

(e) Masa corn products drying operations, identified as D-15A (Masa "A" System) and D-15B (Masa "B" System). Installed in 1992. D-15A and D-15B each have a maximum throughput capacity of 6.5 tons per hour. Each of these processes is controlled by two cyclones in series. Each operation exhausts out one (1) stack identified as S/V 7A and 7B, respectively. The primary cyclone for each process is considered integral to the process.

(f) Two (2) grading systems: Grading system A, with pneumatic conveyance system exhausts identified as D-21, D-22, and D-23, and Grading system B, with pneumatic conveyance system exhausts identified as D-24, D-25, and D-26. Installed in 1974. Grading systems A and B each have a combined maximum throughput capacity of 30 tons of grain per hour. Each pneumatic conveyance system exhaust is equipped with one (1) stack, identified, as S/V 9, 10, and 11, respectively for grading system A, and S/V 12, 13, and 14, respectively for grading System B. Each exhaust has baghouse control.

(g) Germ Recovery System, identified as D-30 and D-31. Installed in 1974. Each recovery system has a maximum throughput capacity of 2.5 tons per hour and equipped with common baghouse control exhausting through two (2) stacks identified as S/V 17 and 18.

(h) One (1) Finished Products System, identified as D-37. Installed in 1974. The finished products system has a maximum throughput capacity of 33 tons of corn products per hour, and is equipped with baghouse control, exhausting through a single stack, identified as S/V 24.

(i) Masa Hammermill Dust System identified as D-50. Installed in 1999. The Masa Hammermill Dust System consists of two (2) hammermills with a combined maximum throughput capacity of 15.0 tons per hour and is equipped with a baghouse exhausting at S/V D-50.

(j) 9th Floor Filter Reroute, identified as D-52. Installed in 1999. This process has a maximum throughput capacity of 4.5 tons per hour and is controlled by a baghouse exhausting at S/V D-52.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limit [326 IAC 2-2]

(a) In order to render the requirements of 326 IAC 2-2 not applicable with respect to PM emissions:

(1) the Masa Hammermill Dust System, identified as Emission Unit ID D-50, shall be limited to 1.29 lb/hr of PM.

(2) the 9th Floor Filter Reroute, identified as D-52, shall be limited to 4.32 lb/hr of PM.

(b) In order to render the requirements of 326 IAC 2-2 not applicable with respect to PM10 emissions:

(1) from corn products drying operations, Masa "A" and "B" systems, identified as D-15A, and D-15B each shall not limited to 1.63 lb/hr.

(2) the Masa Hammermill Dust System, identified as Emission Unit ID D-50, shall be limited 0.77 lb/hr of PM10.

(3) the 9th Floor Filter Reroute, identified as D-52, shall be limited to 2.47 lb/hr of PM10.

D.2.2 Particulate Matter Limitations [326 IAC 6.5-1-2(d)(1)] [326 IAC 6.5-1-2(a)]

(a) Pursuant to 326 IAC 6.5-1-2(d)(1) (Particulate Matter Limitations), particulate matter (PM) emissions from grain receiving operations shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

(b) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations), particulate matter (PM) emissions from corn products drying operations, Masa "A" and "B" systems, identified as D-15A, and D-15B, the Grading system A , with pneumatic conveyance system exhausts identified as D-21, D-22, and D-23, and Grading system B, with pneumatic conveyance system exhausts identified as D-24, D-25, and D-26, the Germ Recovery System, identified as D-30 and D-31, the Masa Hammermill Dust System, identified as Emission Unit ID D-50 and the 9th Floor Filter Reroute, identified as Emission Unit ID D-52 shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

D.2.3 Particulate Matter Limitations: Marion County [326 IAC 6.5-6]

(a) Pursuant to 326 IAC 6.5-6 (Particulate Matter Limitations: Marion County), the particulate matter (PM) emissions from grain elevator headhouse operations, identified as D-11 and D-14 shall each not exceed 0.03 grains per dry standard cubic foot of exhaust air. Emission Unit ID D-11 shall not exceed 3.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Emission Unit ID D-14 shall not exceed 6.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) Pursuant to 326 IAC 6.5-6 (Particulate Matter Limitations: Marion County), the particulate matter (PM) emissions from drying and cooling operations, identified as D-6, D-7, D-8 and D-15 shall each not exceed 0.03 grains per dry standard cubic foot of exhaust air. Emission Unit ID D-6 shall not exceed 12.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Emission Unit ID D-7 shall not exceed 9.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Emission Unit ID D-8 shall not exceed 3.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Emission Unit ID D-15 shall not exceed 5.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.2.4 Particulate Matter Limitations [326 IAC 6.5-1-2(d)(2)]

Pursuant to 326 IAC 6.5-1-2(d)(2) (Particulate Matter Limitations), the following shall be provided:

(a) Good housekeeping practices conducted in the following areas or operations:

(1) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floor decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentrations; and grain driers with respect to accumulated particulate matter.

(2) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.

(3) Dust from driveway, access roads, and other areas of travel be controlled.

(4) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(b) Good equipment maintenance will be those procedures which eliminate or minimize emissions from equipment or a system caused by:

(1) Malfunctions.
(2) Breakdowns.
(3) Improper adjustments.
(4) Operation above rated or designed capacity.
(5) Not following designed operating specifications.
(6) Lack of good preventive maintenance care.
(7) Lack of critical and proper spare replacement parts on hand.
(8) Lack of properly trained and experienced personnel.

(c) Emissions from the affected areas, operations, equipment and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for this facility and its control devices. Section B - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements

D.2.6 Particulate Control [326 IAC 2-7-6(6)]

(a) In order to demonstrate compliance with Condition D.2.2 (a), the baghouse for particulate matter control shall be in operation at all times when grain receiving operations are in operation.

(b) In order to demonstrate compliance with Condition D.2.2 (b), the cyclones and baghouses for particulate matter (PM) control shall be in operation at all times D-15A, D-15B, D-5, D-21, D-22, D-23, D-24, D-25, D-26, D-30, D-31, D-37, D-50 and D-52 are in operation.

(c) In order to demonstrate compliance with Condition D.2.3 (a), the cyclones for particulate matter control shall be in operation at all times D-11 and D-14 are in operation in order to comply with the PM emission limit.

(d) In order to demonstrate compliance with Condition D.2.3 (b), the cyclones for particulate matter control shall be in operation at all times D-6, D-7, D-8 and D-15 are in operation in order to comply with the PM limit.

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

Compliance Monitoring Requirements [**326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.2.7 Visible Emissions Notations

(a) Visible emission notations of S/Vs 8, 5, 6, 2, 3, 4, 7, 7A, 7B, 9, 10, 11, 12, 13, 14, 17, 18, 24, 50 and 52 stack 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. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.8 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the grain receiving operations (D-20), grading system A (D-22, D-23), grading system B (D-25, D-26), the germ recovery system (D-30, D-31), the finished products system (D-37), Masa Hammermill Dust system (D-50) and 9th Floor Filter Reroute (D-52) at least once per day when the listed processes are in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 0.5 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.9 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouses used in conjunction with the grading system A (D-21) and grading system B (D-24) at least once per day when the listed processes are in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 0.5 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.10 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later that 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 indicted by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.2.11 Cyclone Failure Detection

In the event that cyclone failure has been observed: Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. 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). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a violation of this permit.

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

D.2.12 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.7, the Permittee shall maintain records of once per day visible emission notations of the stack exhaust from S/Vs 8, 5, 6, 2, 3, 4, 7, 7A, 7B, 9, 10, 11, 12, 13, 14, 17, 18, 24, 50 and 52. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the truck receiving, rail receiving and/or the rail screening did not operate that day).

(b) To document the compliance status Condition D.2.8 and D.2.9, the Permittee shall maintain records of the pressure drop across the baghouses used in conjunction with the grain receiving operations (D-20), grading system A (D-21, D-22, D-23), grading system B (D-24, D-25, D-26), the germ recovery system (D-30, D-31), the finished products system

(D-37), Masa Hammermill Dust system (D-50) and 9th Floor Filter Reroute (D-52). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the truck receiving, rail receiving and/or the rail screening did not operate that day).

(c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required to be maintained by this condition.

SECTION D.3 FACILITY OPERATION CONDITIONS

INSIGNIFICANT ACTIVITIES - EMISSION UNITS WITH INTEGRAL CONTROLS

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

(a) One (1) Feed Hammermill Lift system, identified as D-27. Installed in 1974. The feed hammermill has a maximum throughput capacity of 28 tons of corn products per hour, and exhausts through three (3) baghouses to a single stack, identified as S/V 27. These baghouses are considered integral to the process. [326 IAC 6.5-1-2(a)]

(b) Reduction System A, identified as D-28 and Reduction System B, identified as D-29. Installed in 1974. Each system is rated at a maximum throughput capacity of 12.5 tons per hour and exhausts through a baghouse considered integral to the process and to, respectively, S/V 15 and Stack/Vent 16. [326 IAC 6.5-1-2(a)]

(c) Coarse Grit Receiver, identified as D-32 and Brewers Grit Receiver, identified as D-33. Installed in 1974. Each is rated at a maximum throughput capacity of 6.25 tons per hour and exhausts through a baghouse integral to the process and to, respectively, S/V 19 and S/V 20. [326 IAC 6.5-1-2(a)]

(d) Two (2) Flour Receivers, identified as D-34 and D-35, one (1) Granulated Meal Receiver, identified as D-36 and one (1) Soft Meal Receiver, identified as D-38. Installed in 1974. Each is rated at a maximum throughput capacity of 5.0 tons per hour and exhausts through a baghouse integral to the process and to, respectively, S/V 21, 22, 23 and 25. [326 IAC 6.5-1-2(a)]

(e) Reduction systems A and B blowers, identified as D-39. Installed in 1974. The reduction systems A and B have a maximum throughput capacity of 12 tons of corn products per hour, and are equipped with baghouse control, exhausting through a single stack, identified as S/V 26. This baghouse is considered integral to the process. [326 IAC 6.5-1-2(a)]

(f) Germ Recovery System Blower identified as D-40 and rated at a maximum throughput capacity of 6.0 tons per hour and exhausting through a baghouse integral to the process and to S/V 45. Installed in 1974. [326 IAC 6.5-1-2(a)]

(g) Two (2) Germ Recovery System Feed Blowers, identified as D-41 and D-42 each with a maximum throughput capacity of 8.0 tons per hour and each system exhausts through four (4) baghouses in parallel and integral to the process and exhausting, respectively, through S/V 28 and 29. Installed in 1974. [326 IAC 6.5-1-2(a)]

(h) Joshi Dryer identified as D-54 with a maximum throughput capacity of 2.0 tons per hour and exhausting through one (1) baghouse integral to the process and to S/V D-54. Installed in 1997. [326 IAC 6.5-1-2(a)]

(i) Joshi Dry Product Transfer Exhaust, identified as D-55. Installed in 1997. This process is controlled by a baghouse and has a maximum throughput capacity of 2.0 tons per hour. This baghouse is considered integral to the process and exhausts to S/V D-55. [326 IAC 6.5-1-2(a)]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter Limitations [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations), particulate matter (PM) emissions from Emission Units ID D-27, D-28, D-29, D-32, D-33, D-34, D-35, D-36 D-38, D-39, D-40, D-41, D-42, D-54 and D-55 each shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for this facility and its control devices. Section B - Preventative Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements

D.3.3 Particulate Control [326 IAC 2-7-6(6)]

In order to demonstrate compliance with Condition D.3.1, the baghouse for particulate matter control shall be in operation at all times when its corresponding emission unit is in operation. Compliance with this condition will satisfy the requirements of 326 IAC 6.5-1-2(a).

SECTION D.4 FACILITY OPERATION CONDITIONS

INSIGNIFICANT ACTIVITIES - LOAD OUT EMISSION UNITS

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

(j) Railcar Load Out and Bulk Packaging of finished products, identified as D-43 (Flour Loadout), D-44 (Yellow Goods Loadout-Course Grit), 44a (Yellow Goods Loadout-Course Grit), 45 (Yellow Goods Loadout-Flaking Grits), 46 (Yellow Goods Loadout-Brewer's Grit), and 46A (Yellow Goods Loadout-Granulated Meal/Cones). Installed in 1974. Flour load out and yellow goods loadout are controlled by spout extensions and loadout enclosures only. General aspiration of all air from this process exhausts to a baghouse. The D-43 operations have maximum throughput capacity of 25 tons per hour and D-44, 44a, 45, 46 and 46a operations have a combined maximum throughput capacity of 26 tons per hour. [326 IAC 6.5-1-2(a)]

(k) Finished Products Shipping and Handling Operations, including feed loadout, identified as D-47. Installed in 1974. Feed loadout is controlled by a spout extension only. The operations have maximum throughput capacity of 60 tons per hour. [326 IAC 6.5-1-2(a)]

(l) One (1) product loadout spout # 4, identified as D-56. Installed in 1974. Feed loadout is controlled by a spout extension only. The operations have maximum throughput capacity of 60 tons per hour. [326 IAC 6.5-1-2(a)]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter Limitations [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations), particulate matter (PM) emissions from Emission Unit ID D-43, D-44, 44a, 45, 46, 46A, D-47, and D-56 each shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

SECTION D.5 FACILITY OPERATION CONDITIONS

INSIGNIFICANT ACTIVITIES

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

(m) Corn Aspiration identified as D-48 and controlled by a baghouse exhausting less than 4000 acfm at S/V D-48. Installed in 1995. [326 IAC 6.5-1-2(a)]

(n) Masa Cooker Steam Ventilation Unit identified as D-49 and controlled by a cyclone exhausting at S/V D-49. Installed in 1996. [326 IAC 6.5-1-2(a)]

(o) Raw Bran Bin Dust Filter identified as D-53 and controlled by a baghouse exhausting at S/V D-53. Installed in 1997. [326 IAC 6.5-1-2(a)]

(p) Natural gas-fired heaters each rated at less than 10 million Btu per hour, installed in 1974, as follows [326 IAC 6.5-1-2(a)]:

(1) maintenance office furnace rated at 0.075 MMBtu/hr;

(2) 2nd floor administrative bldg furnace rated at 0.132 MMBtu/hr;

(3) two (2) 1st floor administrative bldg furnaces rated at 0.100 MMBtu/hr; and

(4) R&D Kitchen space heater rated at 0.05 MMBtu/hr.

(q) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, installed in 1974, as follows: [326 IAC 6.5-1-2(a)]

(1) one (1) gasoline power washer, <5hp.

(r) Brazing equipment, cutting torches, soldering equipment, and welding equipment, , installed in 1974, not resulting in the emission of HAPs; [326 IAC 6.5-1-2(a)]

(1) cutting torches used by maintenance (acetylene-oxygen type);

(2) electric welding equipment; and

(3) electric small-scale soldering irons used as necessary.

(s) Cleaners and solvents having a vapor pressure equal to or less than 2 kiloPascals measured at 38 degrees Celsius (100 degrees Fahrenheit) or having a vapor pressure equal to or less than 0.7 kiloPascals measured at 20 degrees Celsius, the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months, installed in 1974. [326 IAC 8-3-5(a) & (b)]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter Limitations [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations):

(a) Particulate Matter (PM) emissions from Emission Unit ID D-48, D-49 and D-53 each shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

(b) Particulate Matter (PM) emissions from natural gas-fired heaters, each rated at less than 10 million Btu per hour, equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, brazing equipment, cutting torches, soldering equipment, and welding equipment, not resulting in the emission of HAPs and grinding and machining operations each shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

D.5.2 Volatile Organic Compounds (VOCs) [326 IAC 8-3-5(a)]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, the Permittee shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Cargill, Inc.
Source Address: 1730 West Michigan Street, Indianapolis, IN, Indiana 46222-3898
Part 70 Permit No.: T097-24945-00020

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:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Cargill, Inc.
Source Address: 1730 West Michigan Street, Indianapolis, IN, Indiana 46222-3898
Part 70 Permit No.: T097-24945-00020

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12) • The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and • 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.

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
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Cargill, Inc.
Source Address: 1730 West Michigan Street, Indianapolis, IN, Indiana 46222-3898
Part 70 Permit No.: T097-24945-00020

☐ Natural Gas Only ☐ Alternate Fuel burned From:_____ To:_____

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:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Cargill, Inc.
Source Address: 1730 West Michigan Street, Indianapolis, IN, Indiana 46222-3898
Part 70 Permit No.: T097-24945-00020

Months: _____ to_____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	**Cargill, Inc.**
Source Location:	**1730 West Michigan Street, Indianapolis, IN 46222-3898**
County:	**Marion**
SIC Code:	**2041**
Permit Renewal No.:	**T097-24945-00020**
Permit Reviewer:	**Teresa Freeman**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Cargill, Inc. relating to a dry corn milling and processing plant. On July 15, 2007, Cargill, Inc. submitted an application to the OAQ requesting to renew its operating permit. Cargill, Inc. was issued an initial Part 70 Operating Permit (T097-5458-00020) on March 17, 2003.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) Cleaver Brooks Boiler #1 identified as EU #19, installed in 1972, has a rated heat input capacity of 33.5 million Btu per hour. The boiler combusts primarily natural gas and has No. 2 fuel oil as a backup capability and exhausting at S/V 1.

(b) Grain receiving operations, identified as D-20. Installed in 1974. The grain receiving operation has a maximum throughput capacity of 200 tons of grain per hour, and is controlled by a baghouse, exhausting at one (1) stack, identified as S/V 8.

(c) Two (2) grain elevator headhouses, identified as D-11 and D-14. Installed in 1974. Each headhouse has a maximum throughput capacity of 200 tons of grain per hour, and each has cyclone control. Each exhausts at one (1) stack, identified as S/V 5 and 6, respectively.

(d) New mill drying and cooling operations, identified as D-6 (New Mill Dryer), D-7 (New Mill Dryer), D-8 (New Mill Cooler) and D-15 (Oil Mill Dust System). Installed in 1974. D-6 and D-7 each have a maximum throughput capacity of 25 tons per hour. D-8 has a maximum throughput capacity of 50 tons per hour. D-15 has a maximum throughput capacity of 1.5 tons per hour. Each of these processes is controlled by two cyclones in series. Each operation D-6, D-7, D-8 and D-15 exhaust out one (1) stack identified as S/V identification 2, 3, 4 and 7, respectively. The primary cyclone for each process is considered integral to the process.

(e) Masa corn products drying operations, identified as D-15A (Masa “A” System) and D-15B (Masa “B” System). Installed in 1992. D-15A and D-15B each have a maximum throughput capacity of 6.5 tons per hour. Each of these processes is controlled by two cyclones in series. Each operation exhausts out one (1) stack identified as S/V 7A and 7B, respectively. The primary cyclone for each process is considered integral to the process.

(f) Two (2) grading systems: Grading system A, with pneumatic conveyance system exhausts identified as D-21, D-22, and D-23, and Grading system B, with pneumatic conveyance system exhausts identified as D-24, D-25, and D-26. Installed in 1974. Grading systems A and B each have a combined maximum throughput capacity of 30 tons

of grain per hour. Each pneumatic conveyance system exhaust is equipped with one (1) stack, identified, as S/V 9, 10, and 11, respectively for grading system A, and S/V 12, 13, and 14, respectively for grading System B. Each exhaust has baghouse control.

(g) Germ Recovery System, identified as D-30 and D-31. Installed in 1974. Each recovery system has a maximum throughput capacity of 2.5 tons per hour and equipped with common baghouse control exhausting through two (2) stacks identified as S/V 17 and 18.

(h) One (1) Finished Products System, identified as D-37. Installed in 1974. The finished products system has a maximum throughput capacity of 33 tons of corn products per hour, and is equipped with baghouse control, exhausting through a single stack, identified as S/V 24.

(i) Masa Hammermill Dust System identified as D-50. Installed in 1999. The Masa Hammermill Dust System consists of two (2) hammermills with a combined maximum throughput capacity of 15.0 tons per hour and is equipped with a baghouse exhausting at S/V D-50.

(j) 9th Floor Filter Reroute, identified as D-52. Installed in 1999. This process has a maximum throughput capacity of 4.5 tons per hour and is controlled by a baghouse exhausting at S/V D-52.

Insignificant Activities

The source also consists of the following insignificant activities:

(a) One (1) Feed Hammermill Lift system, identified as D-27. Installed in 1974. The feed hammermill has a maximum throughput capacity of 28 tons of corn products per hour, and exhausts through three (3) baghouses to a single stack, identified as S/V 27. These baghouses are considered integral to the process. [326 IAC 6.5-1-2(a)]

(b) Reduction System A, identified as D-28 and Reduction System B, identified as D-29. Installed in 1974. Each system is rated at a maximum throughput capacity of 12.5 tons per hour and exhausts through a baghouse considered integral to the process and to, respectively, S/V 15 and Stack/Vent 16. [326 IAC 6.5-1-2(a)]

(c) Coarse Grit Receiver, identified as D-32 and Brewers Grit Receiver, identified as D-33. Installed in 1974. Each is rated at a maximum throughput capacity of 6.25 tons per hour and exhausts through a baghouse integral to the process and to, respectively, S/V 19 and S/V 20. [326 IAC 6.5-1-2(a)]

(d) Two (2) Flour Receivers, identified as D-34 and D-35, one (1) Granulated Meal Receiver, identified as D-36 and one (1) Soft Meal Receiver, identified as D-38. Installed in 1974. Each is rated at a maximum throughput capacity of 5.0 tons per hour and exhausts through a baghouse integral to the process and to, respectively, S/V 21, 22, 23 and 25. [326 IAC 6.5-1-2(a)]

(e) Reduction systems A and B blowers, identified as D-39. Installed in 1974. The reduction systems A and B have a maximum throughput capacity of 12 tons of corn products per hour, and are equipped with baghouse control, exhausting through a single stack, identified as S/V 26. This baghouse is considered integral to the process. [326 IAC 6.5-1-2(a)]

(f) Germ Recovery System Blower identified as D-40 and rated at a maximum throughput capacity of 6.0 tons per hour and exhausting through a baghouse integral to the process and to S/V 45. Installed in 1974. [326 IAC 6.5-1-2(a)]

(g) Two (2) Germ Recovery System Feed Blowers, identified as D-41 and D-42 each with a maximum throughput capacity of 8.0 tons per hour and each system exhausts through four (4) baghouses in parallel and integral to the process and exhausting, respectively, through S/V 28 and 29. Installed in 1974. [326 IAC 6.5-1-2(a)]

(h) Joshi Dryer identified as D-54 with a maximum throughput capacity of 2.0 tons per hour and exhausting through one (1) baghouse integral to the process and to S/V D-54. Installed in 1997. [326 IAC 6.5-1-2(a)]

(i) Joshi Dry Product Transfer Exhaust, identified as D-55. Installed in 1997. This process is controlled by a baghouse and has a maximum throughput capacity of 2.0 tons per hour. This baghouse is considered integral to the process and exhausts to S/V D-55. [326 IAC 6.5-1-2(a)]

(j) Railcar Load Out and Bulk Packaging of finished products, identified as D-43 (Flour Loadout), D-44 (Yellow Goods Loadout-Course Grit), 44a (Yellow Goods Loadout-Course Grit), 45 (Yellow Goods Loadout-Flaking Grits), 46 (Yellow Goods Loadout-Brewer's Grit), and 46A (Yellow Goods Loadout-Granulated Meal/Cones). Installed in 1974. Flour load out and yellow goods loadout are controlled by spout extensions and loadout enclosures only. General aspiration of all air from this process exhausts to a baghouse. The D-43 operations have maximum throughput capacity of 25 tons per hour and D-44, 44a, 45, 46 and 46a operations have a combined maximum throughput capacity of 26 tons per hour. [326 IAC 6.5-1-2(a)]

(k) Finished Products Shipping and Handling Operations, including feed loadout, identified as D-47. Installed in 1974. Feed loadout is controlled by a spout extension only. The operations have maximum throughput capacity of 60 tons per hour. [326 IAC 6.5-1-2(a)]

(l) One (1) product loadout spout # 4, identified as D-56. Feed loadout is controlled by a spout extension only. The operations have maximum throughput capacity of 60 tons per hour. [326 IAC 6.5-1-2(a)]

(m) Corn Aspiration identified as D-48 and controlled by a baghouse exhausting less than 4000 acfm at S/V D-48. Installed in 1995. [326 IAC 6.5-1-2(a)]

(n) Masa Cooker Steam Ventilation Unit identified as D-49 and controlled by a cyclone exhausting at S/V D-49. Installed in 1996. [326 IAC 6.5-1-2(a)]

(o) Raw Bran Bin Dust Filter identified as D-53 and controlled by a baghouse exhausting at S/V D-53. Installed in 1997. [326 IAC 6.5-1-2(a)]

(p) Natural gas-fired heaters each rated at less than 10 million Btu per hour as follows [326 IAC 6.5-1-2(a)]:

(1) maintenance office furnace rated at 0.075 MMBtu/hr;

(2) 2nd floor administrative bldg furnace rated at 0.132 MMBtu/hr;

(3) two (2) 1st floor administrative bldg furnaces rated at 0.100 MMBtu/hr; and

(4) R&D Kitchen space heater rated at 0.05 MMBtu/hr.

(q) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour as follows: [326 IAC 6.5-1-2(a)]

(1) one (1) gasoline power washer, <5hp.

(r) Brazing equipment, cutting torches, soldering equipment, and welding equipment, not resulting in the emission of HAPs; [326 IAC 6.5-1-2(a)]

(1) cutting torches used by maintenance (acetylene-oxygen type);

(2) electric welding equipment; and

(3) electric small-scale soldering irons used as necessary.

(s) Cleaners and solvents having a vapor pressure equal to or less than 2 kiloPascals measured at 38 degrees Celsius (100 degrees Fahrenheit) or having a vapor pressure equal to or less than 0.7 kiloPascals measured at 20 degrees Celsius, the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months; [326 IAC 8-3-5(a) & (b)]

(t) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4][326 IAC 6-5]

(u) Asbestos abatement projects regulated by 326 IAC 14-10;

(v) Combustion source flame safety purging for startup;

(w) Vessels storing lubricating oils, hydraulic oils, and machining fluids as follows:

(1) Mineral Oil AST (6,500 gallons)

(2) Hydraulic oils and other commercially-available lubricants (55 gallons or smaller)

(x) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;

(y) Machining where an aqueous cutting coolant continuously floods the machining interface:

(1) small shop band saw which uses water-based coolant for cutting metals.

(z) Closed loop heating and cooling systems;

(aa) Use of water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs;

(bb) Replacement or repair of bags in baghouses and filters in other air filtration equipment;

(cc) Process vessel degassing and cleaning;

(dd) Sight glass, boiler, compressor, pump, and cooling tower blowdown;

(ee) Purge double block and bleed valves;

(ff) Filter or coalescer media changeout; and

(gg) Laboratory facilities.

Existing Approvals

Since the issuance of the Part 70 Operating Permit T097-5458-00020 on March 17, 2003, the source has constructed or has been operating under the following additional approvals:

(a) Administrative Amendment No. 097-17839-00020, issued on July 22, 2003;

(b) Administrative Amendment No. 097-20042-00020, issued on November 11, 2004; and

(c) Administrative Amendment No. 097-25269-00020, issued on January 14, 2008.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Air Pollution Control Justification as an Integral Part of the Process

On June 20, 2007 and June 19, 2009 the Permittee requested the following systems and/or control devices to be considered as an integral part of the processes:

(a) New mill drying and cooling operations, identified as D-6 (New Mill Dryer), D-7 (New Mill Dryer), and D-8 (New Mill Cooler)

(b) Two (2) grain elevator headhouses, identified as D-11 and D-14

(c) Masa corn products drying operations, identified as D-15A (Masa "A" System) and D-15B (Masa "B" System)

(d) Grain receiving operations, identified as D-20

(e) Two (2) grading systems: Grading system A, with pneumatic conveyance system exhausts identified as D-21, D-22, and D-23, and Grading system B, with pneumatic conveyance system exhausts identified as D-24, D-25, and D-26

(f) Germ Recovery System, identified as D-30 and D-31

(g) One (1) Finished Products System, identified as D-37

(h) Masa Hammermill Dust System identified as D-50

(i) 9th Floor Filter Reroute, identified as D-52

On June 19, 2009, Cargill, Inc. submitted a listing and a justification of which emission units should be considered to have "integral control" devices.

(a) Cargill, Inc., maintains that their emissions are below major source thresholds and the source should be permitted as a minor source because the dust collection equipment is an integral part of the grain storage, handling and milling operations.

(1) The process cannot operate without the control equipment.

The dust collection equipment on the grain storage, handling and milling operations serves a primary purpose other than pollution control. The purpose of the baghouses and cyclones on these operations is to transport, separate/classify and recover product, as well as to provide aspiration so that the process is operated under negative pressure.

(2) The control equipment serves a primary purpose other than pollution control.

As discussed previously, the dust collection equipment would be installed if no air quality regulations were in place because the dust collection system is necessary to transport, separate/classify and collect product. Without the dust collection system, product would be lost and as a result there would be a significant net economic loss.

(3) The control equipment has an overwhelming positive net economic effect.

The dust collection system is an inherent part of the process because it must be in place not only to recover product, but also to transport, separate and classify material and product. In addition, the dust collection system is necessary to provide aspiration so that the process is operated under negative pressure, which ensures minimal loss of product. The dust collection system collects greater than 99% of the material entering the system as product. The cost of the dust collection equipment, including the total cost of installation, operation and maintenance is significantly less than the net savings that results from recovering product. Because of the confidential nature of the value of our product and because the dust collection equipment meets two of the criteria from the U.S. EPA and IDEM guidance, the cost for a cyclone has an approximate replacement cost of $12,000 and an equipment-life of approximately 50 years. Based on these estimates, the annualized cost for a cyclone is approximately $240 per year. In comparison, the value of the hominy product recovered from the cyclone would have a value of $3600 (per year).

IDEM OAQ does agree that the primary cyclone for the following units can be considered integral to the process:

(a) New Mill Dryer D-6

(b) New Mill Dryer D-7

(c) New Mill Cooler D-8

(d) Oil Mist Dust System D-15

(e) Masa “A” System D-15A

(f) Masa “B” System D-15B

IDEM, OAQ has evaluated the justification and determined that the baghouses are NOT integral to the processing of a product. This determination was based on the following:

(a) The control equipment must be necessary to the actual process.

The source has not demonstrated that Emission Units D-20, D-21, D-22, D-23, D-24, D-25 and D-26 could not physically function without the control equipment. This requires more than showing that the process has been constructed in such a way that there is an electric interlock or some other connection that prevents the process from operating unless the pollution control equipment is in operation.

(b) The control equipment will have to serve as a fundamental component in another process or operation.

During the evaluation done in 2000, Montgomery Watson submitted details of which units at the source should be considered to have “integral controls” and a

detailed reexamination of the resultant source wide potential to emit regulated pollutants. It provided documentation of the control devices that were considered inherent to the physical and operational design of the facility on the grounds and which facilities cannot operate without the pollution control equipment. Cargill stated the chosen control devices were "inherent to the physical and operational design of the facility on the grounds that the processes would not be viable without the operation of control equipment because the add on controls served the primary purpose of the direct conveyance or transfer of various facility products from one system to the next.

We agreed with the evaluation and believe that all units were evaluated by Cargill during the 2000 evaluation and identified all of the units that met the criteria.

(c) The control equipment has an overwhelming positive net economic effect.

Finding a market for a product that would otherwise have been disposed of does not provide financial motivation to ensure that dust does not escape into the atmosphere. The annual income from this product is very minor to the value of the main products upon which Cargill bases their financial security. The value of the product does not ensure proper operation and maintenance of the baghouses, especially in light of a recent inspection on March 31, 2010, where the animal feed product was being collected in a garbage can.

Air/product separators in pneumatic conveying are listed as equipment that are necessary to the process and are therefore integral devices; in practice these units are viewed as product recovery devices and the source must conduct a cost analysis in order to support an integral to the process claim. Control equipment, such as a product or raw material recovery device, whose total annualized cost of purchase, installation, operation, and maintenance is far less than the net savings that the source enjoys from recovering otherwise lost product. We believe in 2000 that Cargill identified processes that reflect the main products that they produce and that the animal feed product is a comparatively minor profit, not an overwhelming positive net economic benefit. That is, IDEM does believe $3600.00 per year would not provide enough economic benefit or incentive to Cargill, Inc. to ensure that the controls are operated at all times the process is in operation and to make sure the controls are as effective as necessary to meet applicable requirements under Part 70.

Therefore, the PTE before control was used to determine the level of permit required to the following equipment:

(a) Two (2) grain elevator headhouses, identified as D-11 and D-14

(b) Grain receiving operations, identified as D-20

(c) Two (2) grading systems: Grading system A, with pneumatic conveyance system exhausts identified as D-21, D-22, and D-23, and Grading system B, with pneumatic conveyance system exhausts identified as D-24, D-25, and D-26

(d) Germ Recovery System, identified as D-30 and D-31

(e) One (1) Finished Products System, identified as D-37

(f) Masa Hammermill Dust System identified as D-50

(g) 9th Floor Filter Reroute, identified as D-52

On March 24, 2000, Montgomery Watson, on behalf of Cargill Dry Corn Ingredients, submitted a listing and a justification of which emission units should be considered to have "integral control" devices. On July 10, 2000, Montgomery Watson submitted the report entitled "1999 Air Emissions Inventory Report for Illinois Cereal Mills, Indianapolis, Indiana" as a detailed examination of which units at the source should be considered to have "integral controls" and a detailed reexamination of the resultant source wide potential to emit regulated pollutants.

The report(s) provided documentation that the above listings of process' control devices are inherent to the physical and operational design of the facility on the grounds that these facilities cannot operate without the pollution control equipment. Cargill stated that the control devices were "inherent to the physical and operational design of the facility on the grounds that the processes would not be viable without the operation of control equipment because the add on controls served the primary purpose of the direct conveyance or transfer of various facility products from one system to the next."

IDEM, OAQ and OES evaluated the justifications and agreed that the following equipment will be considered as integral parts of the processes. Therefore, the permitting level will be determined for these facilities using the potential to emit after the air pollution control equipment.

This conclusion was initially determined under Part 70 Operating Permit Renewal T097-5458-00200) on March 7, 2003.

(a) Masa B Cooling System, identified as D-4 (no longer at the source)

(b) One (1) Feed Hammermill Lift system, identified as D-27

(c) Reduction System A, identified as D-28

(d) Reduction System B, identified as D-29

(e) Germ Recovery System Cyclones, prior to baghouse control/exhaust, identified as D-31

(f) Course Grit Receiver, identified as D-32

(g) Brewer's Grit Receiver, identified as D-33

(h) Flour Receiver, identified as D-34

(i) Flour Receiver, identified as D-35

(j) Gran. Meal Receiver, identified as D-36

(k) Soft Meal Receiver, identified as D-38

(l) Reduction Systems A & B, identified as D-39

(m) Germ Recovery System, identified as D-40

(n) Feed Blowers, identified as D-41

(o) Feed Blowers, identified as D-42

(p) Joshi Dryer System, identified as D-54

(q) Joshi Product Transfer Exhaust Blower, identified as D-55

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Marion County

Pollutant	Designation
SO_2	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O_3	Attainment effective November 8, 2007, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.	

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5
Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM2.5 and SO_2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Marion County has been classified as attainment or unclassifiable in Indiana for PM, PM10, SO_2, NO_2, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The grain elevator has an applicable New Source Performance Standard that was in effect on August 7, 1980; therefore its fugitive emissions from emission units within the source category are counted toward the determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
$PM_{2.5}$	greater than 100
SO_2	less than 100
VOC	less than 10
CO	less than 25
NO_x	less than 25

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

HAP's	Potential To Emit (tons/year)
single HAP	less than 10
TOTAL	less than 25

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM10*	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Boiler	2.10	1.09	1.09	74.41	20.96	0.79	12.08	Less than 1	Negl.
Point Sources	875.3	726.0	666.5	-	-	-	-	-	-
Fumigant*	-	-	-	-	-	-	-	7.2	7.2
Other Point Sources-combustion	0.07	0.07	0.07	0.01	0.9	0.05	0.75	Negl	Negl.
Fugitive Emissions	1.35	0.31	0.31	-	-	-	-	-	-
Total PTE of Entire Source	**878.82**	**727.47**	**668.02**	**74.42**	**21.86**	**0.84**	**12.83**	**7.2**	**7.2**
Title V Major Source Thresholds	N/A	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	N/A	N/A
Nonattainment NSR Major Source Thresholds	N/A	N/A	100	100**	N/A	N/A	N/A	N/A	N/A

*source provided emissions for T097-5458-00020
**as a precurser for PM2.5

(a) This existing stationary source is major for PSD because the emissions of at least one attainment pollutant is greater than two hundred fifty (>250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

(b) This existing stationary source is major for Nonattainment New Source Review because emissions of $PM_{2.5}$ are greater than one hundred (>100) per year and it is not one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Grain receiving operations D-20 (S/V 8) -PM	Baghouse	0.03gr/dscf	30.7	10.58	100	N	N
Grain elevator headhouses D-11 (S/V 5)-PM	Cyclones	0.03gr/dscf	53.44	3.1	100	N	N
Grain elevator headhouses D-14 (S/V 6)-PM	Cyclones	0.03gr/dscf	53.44	6.0	100	N	N
New Mill Dryer D-6 (S/V 2) -PM	Cyclones	0.03gr/dscf	24.09	12.0	100	N	N
New Mill Dryer D-7 (S/V 3) -PM	Cyclones	0.03gr/dscf	24.09	9.4	100	N	N
New Mill Cooler D-8 (S/V 4) -PM	Cyclones	0.03gr/dscf	48.2	3.1	100	N	N
Oil Mist Dust System D-15 (S/V 7) -PM	Cyclones	0.03gr/dscf	2.96	5.90	100	N	N
Masa “A” System D-15A (S/V 7A)-PM	Cyclones	0.02gr/dscf	6.26	7.51	100	N	N
Masa “B” System D-15B (S/V 7B)-PM	Cyclones	0.02gr/dscf	6.26	7.51	100	N	N
Grading system A D-21 (S/V 9) -PM	Baghouse	0.03gr/dscf	59.13	7.55	100	N	N
Grading system A, D-22 (S/V 10) -PM	Baghouse	0.03gr/dscf	118.3	7.55	100	Y	N
Grading system A D-23 (S/V 11) -PM	Baghouse	0.03gr/dscf	59.13	7.55	100	N	N
Grading system B D-24 (S/V 12) -PM	Baghouse	0.03gr/dscf	59.13	7.55	100	N	N
Grading system B D-25, (S/V 13) -PM	Baghouse	0.03gr/dscf	118.3	7.55	100	Y	N
Grading system B D-26 (S/V 14) -PM	Baghouse	0.03gr/dscf	59.13	7.55	100	N	N
Germ Recovery System D-30 31(S/V 17) -PM	Cyclone/ baghouse	0.03gr/dscf	8.91	4.39	100	N	N
Germ Recovery System D-31(S/V 18) -PM	Cyclone/ baghouse	0.03gr/dscf	8.91	4.39	100	N	N
Finished Products System D-37(S/V 24) -PM	Baghouse	0.03gr/dscf	8.82	15.09	100	N	N
Masa Hammermill Dust System D-50 (S/V D-50) -PM	Baghouse	0.03gr/dscf	87.8	7.55	100	N	N
Masa Hammermill Dust System D-50 (S/V D-50) –PM10	Baghouse	0.03gr/dscf	21.95	7.55	100	N	N
9th Floor Filter Reroute D-52 (S/V D-52) -PM	Baghouse	0.03gr/dscf	35.48	0.04	100	N	N
9th Floor Filter Reroute D-52 (S/V D-52) –PM10	Baghouse	0.03gr/dscf	35.48	0.04	100	N	N
Masa B Cooling System D-4 (S/V D-4) -PM	Baghouse	0.03gr/dscf	3.99	13.49	100	N	N
Feed Hammermill Lift system D-27 (S/V 27) -PM	Baghouse	0.03gr/dscf	4.22	10.14	100	N	N
Reduction System A D-28 (S/V 15) -PM	Baghouse	0.03gr/dscf	1.16	2.78	100	N	N
Reduction System B, D-29 (S/V 16) -PM	Baghouse	0.03gr/dscf	1.16	2.78	100	N	N
Course Grit Receiver, D-32(S/V 19) -PM	Baghouse	0.03gr/dscf	1.66	3.59	100	N	N

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Brewer's Grit Receiver, D-33(S/V 20) -PM	Baghouse	0.03gr/dscf	1.66	3.59	100	N	N
Flour Receiver, D-34 (S/V 21) -PM	Baghouse	0.03gr/dscf	1.16	2.50	100	N	N
Flour Receiver, D-35 (S/V 22) -PM	Baghouse	0.03gr/dscf	1.16	3.59	100	N	N
Grain. Meal Receiver D-36 (S/V 23) -PM	Baghouse	0.03gr/dscf	1.66	3.59	100	N	N
Soft Meal Receiver D-38 (S/V 25) -PM	Baghouse	0.03gr/dscf	1.66	8.50	100	N	N
Reduction Systems A & B D-39(S/V 26) -PM	Baghouse	0.03gr/dscf	2.44	8.50	100	N	N
Germ Recovery System D-40 (S/V 45) -PM	Baghouse	0.03gr/dscf	1.64	8.50	100	N	N
Feed Blowers D-41 (S/V 28) -PM	Baghouse	0.03gr/dscf	0.66	2.54	100	N	N
Feed Blowers D-42 (S/V 29) -PM	Baghouse	0.03gr/dscf	0.66	2.54	100	N	N
Joshi Dryer System D-54 (S/V D-54) -PM	Baghouse	0.03gr/dscf	2.82	13.49	100	N	N
Joshi Product Transfer Exhaust Blower D-55 (S/V D-55) -PM	Baghouse	0.03gr/dscf	0.94	0.74	100	N	N
Railcar Load Out and Bulk Packaging of finished products D-43, D-44, 44a, 45, 46, 46A	None	0.03gr/dscf	0.74	0.74	100	N	N
Corn Aspiration D-48 (S/V48) -PM	Baghouse	0.03gr/dscf	<5	4.51	100	N	N
Finished Products Shipping and Handling Operations D-47-PM	None	0.03gr/dscf	0.9	0.9	100	N	N
Masa Cooker Steam Vent Unit D-49 (S/V 49) -PM	cyclone	0.03gr/dscf	<5	<5	100	N	N
Raw Bran Bin Dust Filter D-53 (S/V 53) -PM	Baghouse	0.03gr/dscf	0.13	0.45	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to Grading system A, D-22 (S/V 10) and Grading system B D-25, (S/V 13) for PM upon issuance of this Title V Renewal. A CAM plan has beeen incorporated into this Part 70 permit renewal.

For NSPS/NESHAPs

(a) The requirements of the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.40b, Subpart Db are not included in the permit for the Cleaver Brooks Boiler #1. Construction of this unit commenced prior to the applicability date of June 19, 1984 and it does not have heat input capacity greater than 100 MMBtu/hr.

(b) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.40c, Subpart Dc, are not included in the permit for the Cleaver Brooks Boiler #1. Construction of this unit commenced prior to the applicability date of June 9, 1989.

(c) The requirements of the New Source Performance Standard for Grain Elevators, 326 IAC 12 and 40 CFR 60.300, Subpart DD, are not included in the permit for the grain receiving, storage, load out and handling operations because this facility commenced operations prior to the applicability date of August 3, 1978 for Subpart DD. There have been no modifications after 1978 to grain receiving, storage, load out or handling operations which resulted in an increase in the emission rate for the pollutant (PM) to which the standard applies.

(d) The requirements of the New Source Performance Standard for Stationary Compression ignition Internal Combustion Engines (CI ICE), 326 IAC 12 and 40 CFR 60, Subpart IIII, are not included in the permit for the gasoline power washer because it was manufactured before 2007 and is not a fire pump engine.

(e) The requirements of the New Source Performance Standard for Stationary Spark Ignition Internal Combustion Engines (SI ICE), 326 IAC 12 and 40 CFR 60, Subpart JJJJ, are not included in the permit for the gasoline power washer because it was manufactured before July1, 2008 and is not a fire pump engine.

(f) The gasoline power washer (<5 HP) is not subject to the requirements of the 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (326 IAC 20-82), because it is portable or transportable and therefore is considered a non-road engine as defined at 40 CFR 1068.30, Subpart ZZZZ.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20 and 40 CFR 63, Subpart GGGG, is not included in the permit because the source does not perform vegetable oil production at this facility.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 1-5-2 (Emergency Reduction Plans)
The source is subject to 326 IAC 1-5-2.

326 IAC 2-2 (Prevention of Significant Deterioration)

History

(a) Construction of Cargill, Inc. dry corn milling and processing plant commenced prior to August 7, 1977; therefore the source was not originally subject to the PSD requirements of 326 IAC 2-2. This source is not considered 1 of 28 source categories, however there was an applicable New Source Performance Standard that was in effect on August 7, 1980. At this time the only known pollutant to exceed the PSD major source threshold based on unlimited PTE was PM.

PSD Lookback

(a) Existing Plant Configuration on August 7, 1977
Based on the units that existed at Cargill, Inc. as of the PSD applicability date, August 7, 1977, the source would have been considered an existing major source under PSD because the controlled PTE of PM exceeded 250 tons per year. The PTE of PM_{10} also exceeded 250 tons per year; however, PM_{10} was not yet a NSR regulated pollutant. Since the source constructed prior to the PSD applicability date, PSD BACT analysis was not required for the existing units. All subsequent modifications would have been evaluated against the PSD significant levels.

(b) 1992 Modification
The 1992 modification consisted of the addition of one (1) Masa "A" System (D-15-A) and one (1) Masa "B" System (D-15-B). The increase in potential to emit (PTE) from this project was less than the PSD significant levels for PM, but exceeded significant levels for PM10. PM10 emissions have been limited to less than1.63 lb/hr.

(c) 1995 Modification
The 1995 modification consisted of the addition of one (1) Corn Aspiration (D-48). The increase in PTE from this project was less than the PSD significant levels or naturally minor. No facility-specific limits or PSD BACT analysis would have been necessary.

(d) 1996 Modification
The 1996 modification consisted of the addition of one (1) Masa Cooker Steam Ventilation System (D-49). The increase in PTE from this project was less than the PSD significant levels or naturally minor.

(e) 1997 Modification
The 1997 modification consisted of the addition of one (1) Raw Bran Bin Dust Filter (D-53), one (1) Joshi 3 Dryer Filter Receiver, and one (1) Joshi 3 Finished Product Filter Receiver (D-55). The increase in PTE from this project was less than the PSD significant levels or naturally minor.

(f) 1998 Modification
The 1998 modification consisted of the addition of one (1) Flaking Grit Drying (D-5), one (1) Joshi Raw Flour Transfer (D-50), one (1) Joshi Mill Lift (D-51), and one (1) Joshi Dryer (D-52). Only the Flaking Grit Drying was built, not the three other pieces of equipment. The increase in PTE from this project was less than the PSD significant levels or naturally minor. Note: Flaking Grit Drying (D-5) has been removed from the facility.

(g) 1999 Modification
The 1999 modification consisted of the rerouting of emissions from indoors through baghouses to the atmosphere of one (1) Masa Hammermill (2) Dust (D-50) and one (1) 9^{th} Floor Filter Reroute (D-52). The increase in PTE from this project was less than the PSD significant levels after consideration of PM control. The particulate control devices controlling these units must be in operation at all times when the units are in operation. This is an existing requirement in the permit. Based on the requirement to use of the particulate control device, PSD BACT analysis would not have been necessary for this project. The PM emissions from the Masa Hammermill (2) Dust and the 9^{th} Floor Filter Reroute shall be limited to 1.29 lb/hr and 4.32 lb/hr, respectively. The PM10 emissions from the Masa Hammermill (2) Dust and the 9^{th} Floor Filter Reroute shall be limited to 0.77 lb/hr and 2.47 lb/hr, respectively.

326 IAC 2-6 (Emission Reporting)
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2011, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(*c)(5)*

326 IAC 6.5 PM Limitations Except Lake County
This source is subject to 326 IAC 6.5 because it is located in Marion County, its PM PTE (or limited PM PTE) is equal to or greater than 100 tons/year or actual emissions are equal to or greater than 10 tons/year. This source is one of the sources specifically listed in 326 IAC 6.5-6. Therefore, 326 IAC 6.5-6 applies.

State Rule Applicability – Individual Facilities

Cleaver Brooks Boiler #1

326 IAC 6.5-6 (Particulate Matter Limitations: Marion County)
Pursuant to 326 IAC 6.5-6 (Particulate Matter Limitations: Marion County), particulate matter (PM) emissions from the Cleaver Brooks Boiler #1 identified as EU #19 are limited to 0.014 pounds per million Btu and 1.0 tons per year.

Fuel limitation:

(a) Natural Gas combustion (by itself with no other fuel burned) in Cleaver Brooks Boiler #1 (EU #19) shall not exceed 263.15 million cubic feet per twelve (12) consecutive month period with compliance determined at the end of each month.

This usage limit is equivalent to 1.0 ton per year of PM.

(b) Distillate Fuel combustion (by itself with no other fuel burned) in Cleaver Brooks Boiler #1 (EU #19) shall not exceed 1000 kgal per twelve (12) consecutive month period with compliance determined at the end of each month.

This usage limit is equivalent to 1.0 ton per year of PM.

(c) For the purposes of determining compliance, every 1000 gallons (1 kgal) of distillate fuel consumption is equivalent to 0.26 million cubic feet of natural gas consumption based on PM emissions.

This usage limit is required to limit the potential to emit PM to less than 1.0 tons per year.

326 IAC 7-1.1 (Sulfur Dioxide)
Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from EU #19 shall not exceed five tenths (0.5) pounds per million Btu heat input for distillate oil combustion.

326 IAC 7-2-1(Sulfur Dioxide)
Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

Dry Corn Milling and Processing Plant

326 IAC 2-2 (PSD Minor Limit)

(a) In order to render the requirements of 326 IAC 2-2 not applicable with respect to PM emissions:

(1) the Masa Hammermill Dust System, identified as Emission Unit ID D-50, shall be limited to 1.29 lb/hr of PM.

(2) the 9th Floor Filter Reroute, identified as D-52, shall be limited to 4.32 lb/hr of PM.

(b) In order to render the requirements of 326 IAC 2-2 not applicable with respect to PM10 emissions:

(1) from corn products drying operations, Masa "A" and "B" systems, identified as D-15A, and D-15B each shall not limited to 1.63 lb/hr.

(2) the Masa Hammermill Dust System, identified as Emission Unit ID D-50, shall be limited 0.77 lb/hr of PM10.

(3) the 9th Floor Filter Reroute, identified as D-52, shall be limited to 2.47 lb/hr of PM10.

Compliance with these limits shall limit the PM and PM10 emissions to less than twenty-five (25) and fifteen (15) tons per twelve (12) consecutive month period, respectively, and render the requirements of 326 IAC 2-2 not applicable.

326 IAC 6.5-1-2(d)(1)(Particulate Matter Limitations)

(a) Pursuant to 326 IAC 6.5-1-2(d)(1) (Particulate Matter Limitations), particulate matter (PM) emissions from grain receiving operations shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

(b) Pursuant to 326 IAC 6.5-1-2(d)(1) (Particulate Matter Limitations), particulate matter (PM) emissions from grain receiving operations shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

(c) Pursuant to 326 IAC 6.5-1-2(d)(1) (Particulate Matter Limitations), particulate matter (PM) emissions from the Masa "A" and "B" systems, identified as D-15A, and D-15B each shall not exceed 0.03 grains per dry standard cubic foot of exhaust.

(d) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations):

(1) the Grading system A , with pneumatic conveyance system exhausts identified as D-21, D-22, and D-23, and Grading system B, with pneumatic conveyance system exhausts identified as D-24, D-25, and D-26 each shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

(2) the Germ Recovery System, identified as D-30 and D-31 each shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

(3) the Masa Hammermill Dust System, identified as Emission Unit ID D-50, shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

(4) the 9th Floor Filter Reroute, identified as Emission Unit ID D-52, shall be limited to 0.015 grains per dry standard cubic foot of exhaust air.

326 IAC 6.5-1-2(d)(2) (Particulate Matter Limitations)
Pursuant to 326 IAC 6.5-1-2(d)(2) (Particulate Matter Limitations), the following shall be provided:

(a) Good housekeeping practices conducted in the following areas or operations:

(1) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floor decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentrations; and grain driers with respect to accumulated particulate matter.

(2) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.

(3) Dust from driveway, access roads, and other areas of travel be controlled.

(4) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(b) Good equipment maintenance will be those procedures which eliminate or minimize emissions from equipment or a system caused by:

(1) Malfunctions.
(2) Breakdowns.
(3) Improper adjustments.
(4) Operation above rated or designed capacity.
(5) Not following designed operating specifications.
(6) Lack of good preventive maintenance care.
(7) Lack of critical and proper spare replacement parts on hand.
(8) Lack of properly trained and experienced personnel.

(c) Emissions from the affected areas, operations, equipment and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

326 IAC 6.5-6 (Particulate Matter Limitations: Marion County)
(a) Pursuant to 326 IAC 6.5-6 (Particulate Matter Limitations: Marion County):

(1) the particulate matter (PM) emissions from grain elevator headhouse operations, identified as D-11 and D-14 shall each not exceed 0.03 grains per dry standard cubic foot of exhaust air. Emission Unit ID D-11 shall not exceeds 3.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Emission Unit ID D-14 shall not exceed 6.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(2) the particulate matter (PM) emissions from drying and cooling operations, identified as D-6, D-7, D-8 and D-15 shall each not exceed 0.03 grains per dry standard cubic foot of exhaust air. Emission Unit ID D-6 shall not exceed 12.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Emission Unit ID D-7 shall not exceed 9.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Emission Unit ID D-8 shall not exceed 3.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Emission Unit ID D-15 shall not exceed 5.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Insignificant Activities

326 IAC 6.5-1-2(a) (Particulate Matter Limitations)

(a) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations):

(1) particulate matter (PM) emissions from Emission Units ID D-27, D-28, D-29, D-32, D-33, D-34, D-35, D-36 D-38, D-39, D-40, D-41, D-42, D-54 and D-55 each shall not exceed 0.03 grains per dry standard cubic foot of exhaust air. Each baghouse for particulate matter control shall be in operation at all times when its corresponding emission unit is in operation.

(2) particulate matter (PM) emissions from Emission Unit ID D-43, D-44, 44a, 45, 46, 46A, D-47, and D-56 each shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

(3) particulate matter (PM) emissions from Emission Unit ID D-48, D-49 and D-53 each shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

(4) particulate matter (PM) emissions from natural gas-fired heaters, each rated at less than 10 million Btu per hour, equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, brazing equipment, cutting torches, soldering equipment, and welding equipment, not resulting in the emission of HAPs and grinding and machining operations each shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, the Permittee shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

Brooks Cleaver Boiler #1-Sulfur Dioxide Emissions and Sulfur Content

There are no testing requirements for this source.

The compliance status with Condition D.1.3 shall be determined utilizing one of the following options:

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths percent (0.5) pounds per million Btu heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Dry Corn Milling and Processing Plant

(a) In order to demonstrate compliance with Condition D.2.2 (a), the baghouse for particulate matter control shall be in operation at all times when grain receiving operations are in operation.

(b) In order to demonstrate compliance with Condition D.2.2 (b), the cyclones and baghouses for particulate matter (PM) control shall be in operation at all times D-15A, D-15B, D-5, D-21, D-22, D-23, D-24, D-25, D-26, D-30, D-31, D-37, D-50 and D-52 are in operation.

(c) In order to demonstrate compliance with Condition D.2.3 (a), the cyclones for particulate matter control shall be in operation at all times D-11 and D-14 are in operation in order to comply with the PM emission limit.

(d) In order to demonstrate compliance with Condition D.2.3 (b), the cyclones for particulate matter control shall be in operation at all times D-6, D-7, D-8 and D-15 are in operation in order to comply with the PM limit.

(e) In order to demonstrate compliance with Condition D.3.1, the baghouse for particulate matter control shall be in operation at all times when its corresponding emission unit is in operation. Compliance with this condition will satisfy the requirements of 326 IAC 6.5-1-2(a).

(f) 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 compliance monitoring requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Cleaver Brooks Boiler #1 (S/V 1)	Visible Emissions	Daily	Normal-Abnormal	Response Steps
Grain receiving operations D-20 (S/V 8)	Water Pressure Drop	Daily	0.5 to 8.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Grain elevator headhouses D-11 and D-14 (S/V 5, 6)	Visible Emissions	Daily	Normal-Abnormal	Response Steps
New Mill Dryer D-6 (S/V 2)	Visible Emissions	Daily	Normal-Abnormal	Response Steps
New Mill Dryer D-7 (S/V 3)	Visible Emissions	Daily	Normal-Abnormal	Response Steps
New Mill Cooler D-8 (S/V 4)	Visible Emissions	Daily	Normal-Abnormal	Response Steps
Oil Mist Dust System D-15 (S/V 7)	Visible Emissions	Daily	Normal-Abnormal	Response Steps
Masa “A” System D-15A (S/V 7A)	Visible Emissions	Daily	Normal-Abnormal	Response Steps
Masa “B” System D-15B (S/V 7B)	Visible Emissions	Daily	Normal-Abnormal	Response Steps
Grading system A D-21, D-22, and D-23 (S/V 9, 10, 11)	Water Pressure Drop	Daily	0.5 to 8.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Grading system B D-24, D-25, and D-26 (S/V 12, 13, 14)	Water Pressure Drop	Daily	0.5 to 8.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Germ Recovery System D-30 and D-31(S/V 17, 18)	Water Pressure Drop	Daily	0.5 to 8.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Finished Products System D-37(S/V 24)	Water Pressure Drop	Daily	0.5 to 8.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Masa Hammermill Dust System D-50 (S/V D-50)	Water Pressure Drop	Daily	0.5 to 8.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
9th Floor Filter Reroute D-52 (S/V D-52)	Water Pressure Drop	Daily	0.5 to 8.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

(a) Broken or Failed Bag Detection

(1) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(2) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later that 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 indicted by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

(b) Cyclone Failure Detection

(1) In the event that cyclone failure has been observed: Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

These monitoring conditions are necessary to ensure that the baghouses and cyclones are working properly to demonstrate compliance with 326 IAC 2-2 (PSD), 326 IAC 6.5-1-2 (Particulate Matter Limitations), 326 IAC 6.5-6 (Particulate Matter Limitations: Marion County), 326 IAC 2-7 (Part 70) and 40 CFR 64 (CAM).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on June 15, 2007.

Conclusion

The operation of this dry corn milling and processing plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. 097-24945-00020.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Teresa Freeman at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate

Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-1243 or toll free at 1-800-451-6027 extension 4-1243.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Company Name: Cargill, Inc.
Address, City IN Zip: 1730 West Michigan Street, Indianapolis, Indiana 46222-3898
Permit No.: T097-24945-00020
Reviewer: Teresa Freeman
Date: 07/01/10

Process Description	Unit ID	S/V ID	Area	Throughput (Tons/Hr)	Control Description	PM EF	PM10 EF	PM2.5 EF	Primary Control Efficiency	Secondary Control Efficiency	Integral Controls?	Uncontrolled PTE			PTE after Integral Controls			EF Source
												PM	PM10	PM2.5	PM	PM10	PM2.5	
New Mill Dryer	D-6	2	Corn Mill	25	2 Cyclones (1st cyclone is integral)	0.220	0.055	0.0094	0.9	0.9	Y	24.09	6.02	1.03	0.241	0.060	0.010	AP-42; Table 9.9.1-1
New Mill Dryer	D-7	3	Corn Mill	25	2 Cyclones (1st cyclone is integral)	0.220	0.055	0.0094	0.9	0.9	Y	24.09	6.02	1.03	0.241	0.060	0.010	AP-42; Table 9.9.1-1
New Mill Cooler	D-8	4	Corn Mill	50	2 Cyclones (1st cyclone is integral)	0.220	0.055	0.0094	0.9	0.9	Y	48.18	12.05	2.06	0.482	0.120	0.021	AP-42; Table 9.9.1-1
Grain Elevator Headhouse	D-11	5	Grain Elevator	200	Cyclone	0.061	0.034	0.0058	0.9998	0	N	53.44	29.78	5.08	53.436	29.784	5.081	AP-42, Table 9.9.1-1
Grain Elevator Headhouse	D-14	6	Grain Elevator	200	Cyclone	0.061	0.034	0.0058	0.9998	0	N	53.44	29.78	5.08	53.436	29.784	5.081	AP-42, Table 9.9.1-1
Oil Mill Dust System	D-15	7	Oil Mill	1.5	2 Cyclones	0.451	0.451	0.4510	0.9	0.9	N	2.96	2.96	2.96	2.963	2.963	2.963	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Masa "A" System	D-15A	7A	Masa System	6.5	2 Cyclones (1st cyclone is integral)	0.220	0.055	0.0094	0.9	0.9	Y	6.26	1.57	0.27	0.063	0.016	0.003	AP-42, Table 9.9.1-1
Masa "B" System	D-15B	7B	Masa System	6.5	2 Cyclones (1st cyclone is integral)	0.220	0.055	0.0094	0.9	0.9	Y	6.26	1.57	0.27	0.063	0.016	0.003	AP-42, Table 9.9.1-1
Grain Receiving Operations	D-20	8	Grain Elevator	200	Baghouse	0.035	0.008	0.0013	0.9975	0	N	30.66	7.01	1.139	30.660	7.008	1.139	AP-42; Table 9.9.1-1
Grading System A	D-21	9	Corn Mill	7.5	Baghouse	1.80	1.80	1.80	0.9808	0	N	59.13	59.13	59.13	59.130	59.130	59.130	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Grading System A	D-22	10	Corn Mill	15	Baghouse	1.80	1.80	1.80	0.9904	0	N	118.26	118.26	118.26	118.260	118.260	118.260	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Grading System A	D-23	11	Corn Mill	7.5	Baghouse	1.80	1.80	1.80	0.9808	0	N	59.13	59.13	59.13	59.130	59.130	59.130	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Grading System B	D-24	12	Corn Mill	7.5	Baghouse	1.80	1.80	1.80	0.9808	0	N	59.13	59.13	59.13	59.130	59.130	59.130	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Grading System B	D-25	13	Corn Mill	15	Baghouse	1.80	1.80	1.80	0.9904	0	N	118.26	118.26	118.26	118.260	118.260	118.260	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Grading System B	D-26	14	Corn Mill	7.5	Baghouse	1.80	1.80	1.80	0.9808	0	N	59.13	59.13	59.13	59.130	59.130	59.130	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Feed Hammermill Lift System	D-27	27	Feed System	28	3 Baghouses in parallel	0.012	0.012	0.0120	0.9931	0	Y	1.47	1.47	1.47	0.010	0.010	0.010	WebFIRE; SCC 3-02-008-17; grain milling: hammermill.
Reduction System A	D-28	15	Corn Mill	12.5	Baghouse	0.021	0.021	0.021	0.9958	0	Y	1.15	1.15	1.15	0.005	0.005	0.005	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Reduction System B	D-29	16	Corn Mill	12.5	Baghouse	0.021	0.021	0.021	0.9958	0	Y	1.15	1.15	1.15	0.005	0.005	0.005	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Germ Recovery System	D-30	17	Corn Mill		Integral Cyclone + non integral baghouse	0.407	0.226	0.226				8.91	4.95	4.95	8.913	4.949	4.949	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
	D-31	18	Corn Mill	5					0.967	0	N			0.00				
Coarse Grit Reciever	D-32	19	Corn Mill	6.25	Baghouse	0.061	0.030	0.0058	0.9978	0	Y	1.67	0.82	0.16	0.004	0.002	0.000	AP-42, Table 9.9.1-1
Brewers Grit Reciever	D-33	20	Corn Mill	6.25	Baghouse	0.061	0.030	0.0058	0.9978	0	Y	1.67	0.82	0.16	0.004	0.002	0.000	AP-42, Table 9.9.1-1
Flour Reciever	D-34	21	Corn Mill	5	Baghouse	0.053	0.053	0.053	0.9894	0	Y	1.16	1.16	1.16	0.012	0.012	0.012	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Flour Reciever	D-35	22	Corn Mill	5	Baghouse	0.053	0.053	0.053	0.9848	0	Y	1.16	1.16	1.16	0.018	0.018	0.018	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Granulated Meal Reciever	D-36	23	Corn Mill	5	Baghouse	0.076	0.076	0.076	0.9848	0	Y	1.66	1.66	1.66	0.025	0.025	0.025	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Finished Product System	D-37	24	Corn Mill	33	Baghouse	0.061	0.034	0.0058	0.9912	0	N	8.82	4.91	0.84	8.817	4.914	0.838	AP-42, Table 9.9.1-1
Soft Meal Reciever	D-38	25	Corn Mill	5	Baghouse	0.076	0.076	0.076	0.9848	0	Y	1.66	1.66	1.66	0.025	0.025	0.025	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Reduction System A&B Blowers	D-39	26	Corn Mill	12	Baghouse	0.046	0.046	0.046	0.9907	0	Y	2.42	2.42	2.42	0.022	0.022	0.022	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Germ Recovery System Blower	D-40	45	Corn Mill	6	Baghouse	0.062	0.062	0.062	0.9875	0	Y	1.63	1.63	1.63	0.020	0.020	0.020	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Germ Recovery Feed Blower	D-41	28	Germ Recovery	8	4 Baghouses in parallel	0.019	0.019	0.019	0.9962	0	Y	0.67	0.67	0.67	0.003	0.003	0.003	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Germ Recovery Feed Blower	D-42	29	System	8	4 Baghouses in parallel	0.019	0.019	0.019	0.9962	0	Y	0.67	0.67	0.67	0.003	0.003	0.003	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Flour Loadout	D-43	30	Loadout	25	None	0.270	0.176	0.176	none	none	N	29.57	19.22	19.22	29.57	19.22	19.22	PM - AP-42; Table 9.11.1-1; PM10 = 65% of PM (AP42; Table B.2.2;)
Yellow Goods Loadout-Flaking Grits	D-45	D-45	Loadout	5.2	None	0.270	0.176	0.176	none	none	N	6.15	4.00	4.00	6.15	4.00	4.00	PM - AP-42; Table 9.11.1-1; PM10 = 65% of PM (AP42; Table B.2.2;)
Yellow Goods Loadout-Coarse Grit	D-44	D-44	Loadout	5.2	None	0.270	0.176	0.176	none	none	N	6.15	4.00	4.00	6.15	4.00	4.00	PM - AP-42; Table 9.11.1-1; PM10 = 65% of PM (AP42; Table B.2.2;)
Yellow Goods Loadout-Coarse Grit	D-44A	D-44A	Loadout	5.2	None	0.270	0.176	0.176	none	none	N	6.15	4.00	4.00	6.15	4.00	4.00	PM - AP-42; Table 9.11.1-1; PM10 = 65% of PM (AP42; Table B.2.2;)
Yellow Goods Loadout-Brewer's Grits	D-46	D-46	Loadout	5.2	None	0.270	0.176	0.176	none	none	N	6.15	4.00	4.00	6.15	4.00	4.00	PM - AP-42; Table 9.11.1-1; PM10 = 65% of PM (AP42; Table B.2.2;)
Yellow Goods Loadout-Granulated Meal/Cones	D-46A	D-46A	Loadout	5.2	None	0.270	0.176	0.176	none	none	N	6.15	4.00	4.00	6.15	4.00	4.00	PM - AP-42; Table 9.11.1-1; PM10 = 65% of PM (AP42; Table B.2.2;)
Feed Loadout	D-47	D47	Loadout	60	None	0.270	0.176	0.176	none	none	N	70.96	46.12	46.12	70.96	46.12	46.12	PM - AP-42; Table 9.11.1-1; PM10 = 65% of PM (AP42; Table B.2.2;)
Corn Aspiration	D-48	D-48	Corn Mill	55	Baghouse	0.02	0.02	0.02	0.9984	0	N	4.10	4.10	4.10	4.095	4.095	4.095	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Masa Cooker Steam Vent. System	D-49	D-49	Masa System	0.417	Cyclone	0.03	0.01	0.01	0.9	0	N	0.06	0.02	0.02	0.062	0.022	0.022	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Masa Hammermill (2) Dust	D-50	D-50	Masa System	15	Baghouse	0.012	0.012	0.0120	0.999	0	N	0.79	0.79	0.79	0.788	0.788	0.788	AP-42, Table 9.9.1-2
9th Floor Filter Reroute	D-52	D-52	Corn Mill	4.5	Baghouse	1.80	1.80	1.80	0.999	0	N	35.48	35.48	35.48	35.478	35.478	35.478	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Raw Bran Bin Dust Filter	D-53	D-53	Joshi System	2	Baghouse	0.015	0.145	0.145	0.999	0	N	0.13	1.27	1.27	0.131	1.270	1.270	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Joshi 3 Finished Product Filter Reciever	D-55	D-55	Joshi System	2	Baghouse	0.107	0.107	0.107	0.999	0	Y	0.94	0.94	0.94	0.001	0.001	0.001	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Joshi 3 Dryer Filter Reciever	D-54	D-54	Joshi System	2	Baghouse	0.220	0.055	0.0094	0.999	0	Y	1.93	0.48	0.08	0.002	0.000	0.000	reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000
Product Loadout spout #4	D-56	D-56	Loadout	60	None	0.270	0.176	0.1760	none	none	N	70.96	46.12	46.25	70.956	46.121	46.250	PM - AP-42; Table 9.11.1-1; PM10 = 65% of PM (AP42; Table B.2.2;)
												1003.9	**770.6**	**687.1**	**875.3**	**726.0**	**666.5**	

PSD Look Back
Company Name: Cargill, Inc.
Address, City IN Zip: 1730 West Michigan Street, Indianapolis, Indiana 46222-3898
Permit No.: T097-24945-00020
Reviewer: Teresa Freeman
Date: 09/07/10

Units existing Pre-1977

						PM			PM10			PM2.5		
Process Description	**Unit ID**	**S/V ID**	**Throughput (Tons/Hr)**	**Control Description**	**CFM**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**
New Mill Dryer	D-6	2	25	2 Cyclones (1st cyclone is integral)	10789	0.03	2.77	12.00	0.03	2.77	12.00	0.03	2.77	12.00
New Mill Dryer	D-7	3	25	2 Cyclones (1st cyclone is integral)	8092	0.03	2.08	9.40	0.03	2.08	9.40	0.03	2.08	9.40
New Mill Cooler	D-8	4	50	2 Cyclones (1st cyclone is integral)	10789	0.03	2.77	3.10	0.03	2.77	3.10	0.03	2.77	3.10
Elevator Headhouse	D-11	5	200	Cyclone	5395	0.03	1.39	3.10	0.03	1.39	3.10	0.03	1.39	3.10
Elevator Headhouse	D-14	6	200	Cyclone	7800	0.03	2.01	6.00	0.03	2.01	6.00	0.03	2.01	6.00
Oil Mill Dust System	D-15	7	1.5	2 Cyclones	9400	0.03	2.42	5.90	0.03	2.42	5.90	0.03	2.42	5.90
Truck Dump System	D-20	8	200	Baghouse	9392	0.03	2.42	10.58	0.03	2.42	10.58	0.03	2.42	10.58
Grading System A	D-21	9	7.5	Baghouse	6700	0.03	1.72	7.55	0.03	1.72	7.55	0.03	1.72	7.55
Grading System A	D-22	10	15	Baghouse	6700	0.03	1.72	7.55	0.03	1.72	7.55	0.03	1.72	7.55
Grading System A	D-23	11	7.5	Baghouse	6700	0.03	1.72	7.55	0.03	1.72	7.55	0.03	1.72	7.55
Grading System B	D-24	12	7.5	Baghouse	6700	0.03	1.72	7.55	0.03	1.72	7.55	0.03	1.72	7.55
Grading System B	D-25	13	15	Baghouse	6700	0.03	1.72	7.55	0.03	1.72	7.55	0.03	1.72	7.55
Grading System B	D-26	14	7.5	Baghouse	6700	0.03	1.72	7.55	0.03	1.72	7.55	0.03	1.72	7.55
Feed Hammermill lift	D-27	27	28	3 Baghouses in parallel	9000	0.03	2.31	10.14	0.03	2.31	10.14	0.03	2.31	10.14
Reduction System A	D-28	15	12.5	Baghouse	2470	0.03	0.64	2.78	0.03	0.64	2.78	0.03	0.64	2.78
Reduction System B	D-29	16	12.5	Baghouse	2470	0.03	0.64	2.78	0.03	0.64	2.78	0.03	0.64	2.78
Germ Recovery System	D-30	17	5	Integral Cyclone + non integral baghouse	3902	0.03	1.00	4.39	0.03	1.00	4.39	0.03	1.00	4.39
	D-31	18												
Coarse Grit Reciever	D-32	19	6.25	Baghouse	3530	0.03	0.91	3.98	0.03	0.91	3.98	0.03	0.91	3.98
Brewers Grit Reciever	D-33	20	6.25	Baghouse	3530	0.03	0.91	3.98	0.03	0.91	3.98	0.03	0.91	3.98
Flour Reciever	D-34	21	5	Baghouse	2470	0.03	0.64	2.78	0.03	0.64	2.78	0.03	0.64	2.78
Flour Reciever	D-35	22	5	Baghouse	3530	0.03	0.91	3.98	0.03	0.91	3.98	0.03	0.91	3.98
Granulated Meal Reciever	D-36	23	5	Baghouse	3530	0.03	0.91	3.98	0.03	0.91	3.98	0.03	0.91	3.98
Finished Product System	D-37	24	33	Baghouse	13400	0.03	3.45	15.09	0.03	3.45	15.09	0.03	3.45	15.09
Soft Meal Reciever	D-38	25	5	Baghouse	3530	0.03	0.91	3.98	0.03	0.91	3.98	0.03	0.91	3.98
Reduction System A&B Blowers	D-39	26	12	Baghouse	5200	0.03	1.34	5.86	0.03	1.34	5.86	0.03	1.34	5.86
Germ Recovery System Blower	D-40	45	6	Baghouse	3500	0.03	0.90	3.94	0.03	0.90	3.94	0.03	0.90	3.94
Feed Blower	D-41	28	8	4 Baghouses in parallel	1400	0.03	0.36	1.58	0.03	0.36	1.58	0.03	0.36	1.58
Feed Blower	D-42	29	8	4 Baghouses in parallel	1400	0.03	0.36	1.58	0.03	0.36	1.58	0.03	0.36	1.58
Railcar Loadout (Flour)	D-43	30	25	None	-	-	-	29.57	-	-	19.22	-	-	19.22
Yellow Goods Loadout-Flaking Grits	D-45	D-45	5.2	None	-	-	-	6.15	-	-	4.00	-	-	4.00
Yellow Goods Loadout-Coarse Grit	D-44	D-44	5.2	None	-	-	-	6.15	-	-	4.00	-	-	4.00
Yellow Goods Loadout-Coarse Grit	D-44A	D-44A	5.2	None	-	-	-	6.15	-	-	4.00	-	-	4.00
Yellow Goods Loadout-Brewer's Grits	D-46	D-46	5.2	None	-	-	-	6.15	-	-	4.00	-	-	4.00
Yellow Goods Loadout-Granulated Meal/Cones	D-46A	D-46A	5.2	None	-	-	-	6.15	-	-	4.00	-	-	4.00
Feed Loadout	D47	D47	60	None	-	-	-	70.96	-	-	46.12	-	-	46.12
Total								**297.44**			**251.50**			**251.50**

1977 Source Status

In August of 1977, this source would have been an existing major source pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) because the controlled PTE of PM exceeded 100 tons per year.
Subsequent modifications would have been compared to PSD significant levels. Note: PM10 was not regulated at this date.

PSD Look Back
Company Name: Cargill, Inc.
Address, City IN Zip: 1730 West Michigan Street, Indianapolis, Indiana 46222-3898
Permit No.: T097-24945-00020
Reviewer: Teresa Freeman
Date: 09/07/10

1992 Modification						PM			PM10			PM2.5		
Process Description	**Unit ID**	**S/V ID**	**Throughput (Tons/Hr)**	**Control Description**	**CFM**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**
Masa "A" System	D-15A	7A	6.5	2 Cyclones (1st cyclone is integral)	10000	0.03	2.57	11.26	0.019	1.63	7.13	0.013	1.11	4.88
Masa "B" System	D-15B	7B	6.5	2 Cyclones (1st cyclone is integral)	10000	0.03	2.57	11.26	0.019	1.63	7.13	0.013	1.11	4.88
PTE from Modification								**22.53**			**14.27**			**9.76**
PSD Significant Level								**25**			**15**			**10**

1995 Modification						PM			PM10			PM2.5		
Process Description	**Unit ID**	**S/V ID**	**Throughput (Tons/Hr)**	**Control Description**	**CFM**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**
Corn Aspiration	D-48	D-48	55	Baghouse	4000	0.03	1.03	4.51	0.03	1.03	4.51	0.03	1.03	4.51
PTE from Modification								**4.51**			**4.51**			**4.51**
PSD Significant Level								**25**			**15**			**10**

1996 Modification						PM			PM10			PM2.5		
Process Description	**Unit ID**	**S/V ID**	**Throughput (Tons/Hr)**	**Control Description**	**CFM**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**
Masa Cooker Steam Vent. System	D-49	D-49	0.417	Cyclone	4500	0.03	1.16	5.07	0.03	1.16	5.07	0.03	1.16	5.07
PTE from Modification								**5.07**			**5.07**			**5.07**
PSD Significant Level								**25**			**15**			**10**

1997 Modification						PM			PM10			PM2.5		
Process Description	**Unit ID**	**S/V ID**	**Throughput (Tons/Hr)**	**Control Description**	**CFM**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**
Raw Bran Bin Dust Filter	D-53	D-53	2	Baghouse	400	0.03	0.10	0.45	0.03	0.10	0.45	0.03	0.10	0.45
Joshi 3 Dryer Filter Reciever	D-54	D-54	2	Baghouse	7000	0.03	1.80	7.88	0.03	1.80	7.88	0.03	1.80	7.88
Joshi 3 Finished Product Filter Reciever	D-55	D-55	2	Baghouse	1000	0.03	0.26	1.13	0.03	0.26	1.13	0.03	0.26	1.13
PTE from Modification								**9.46**			**9.46**			**9.46**
PSD Significant Level								**25**			**15**			**10**

1998 Modification						PM			PM10			PM2.5		
Process Description	**Unit ID**	**S/V ID**	**Throughput (Tons/Hr)**	**Control Description**	**CFM**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**
Flaking Grit Drying	D-5	2	2.5	Cyclones	12000	0.03	3.09	13.52	0.03	3.09	13.52	0.022	2.26	9.91
Joshi Raw Flour Transfer	D-50	D-50	Never built											
Joshi Mill Lift	D-51	D-51	Never built											
Joshi Dryer	D-52	D-52	Never built											
PTE from Modification								**13.52**			**13.52**			**9.91**
PSD Significant Level								**25**			**15**			**10**

1999 Modification						PM			PM10			PM2.5		
Process Description		**S/V ID**	**Throughput (Tons/Hr)**	**Control Description**	**CFM**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**	**gr/dscf**	**lbs/hr**	**tons/yr**
Masa Hammermill (2) Dust		D-50	15	Baghouse	10000	0.015	1.29	5.63	0.009	0.77	3.38	0.007	0.60	2.63
9th Floor Filter Reroute		D-52	4.5	Baghouse	36000	0.014	4.32	18.92	0.008	2.47	10.81	0.005	1.54	6.76
PTE from Modification								**24.55**			**14.19**			**9.39**
PSD Significant Level								**25**			**15**			**10**

Limits Under 6.5-1-2 or 6.5-6

Company Name: Cargill, Inc.
Address, City IN Zip: 1730 West Michigan Street, Indianapolis, Indiana 46222-3898
Permit No.: T097-24945-00020
Reviewer: Teresa Freeman
Date: 07/01/10

						Limits Under 6.5-1-2 or 6.5-6		
S/V ID	Process Description	Throughput (Tons/Hr)	Control Description	Applicable Limits	CFM	gr/dscf	lbs/hr	tons/yr
2	New Mill Dryer	25	2 Cyclones (1st cyclone is integral)	0.03 gr/dscf, opacity 20%	10789	0.1	9.25	12.00
3	New Mill Dryer	25	2 Cyclones (1st cyclone is integral)	0.03 gr/dscf, opacity 20%	8992	0.03	2.31	9.40
4	New Mill Cooler	50	2 Cyclones (1st cyclone is integral)	0.03 gr/dscf, opacity 20%	10789	0.03	2.77	3.10
5	Elevator Headhouse	200	Cyclone	0.03 gr/dscf, opacity 20%	5395	0.03	1.39	3.10
6	Elevator Headhouse	200	Cyclone	0.03 gr/dscf, opacity 20%	7800	0.03	2.01	6.00
7	Oil Mill Dust System	1.5	2 Cyclones	0.03 gr/dscf, opacity 20%	9400	0.03	2.08	5.90
7A	Masa "A" System	6.5	2 Cyclones (1st cyclone is integral)	0.02 gr/dscf, opacity 30%	10000	0.03	2.57	11.26
7B	Masa "B" System	6.5	2 Cyclones (1st cyclone is integral)	0.02 gr/dscf, opacity 30%	10000	0.03	2.57	11.26
8	Truck Dump System	200	Baghouse	0.03 gr/dscf, opacity 20%	9392	0.03	2.42	10.58
9	Grading System A	7.5	Baghouse	0.03 gr/dscf, opacity 30%	6700	0.03	1.72	7.55
10	Grading System A	15	Baghouse	0.03 gr/dscf, opacity 30%	6700	0.03	1.72	7.55
11	Grading System A	7.5	Baghouse	0.03 gr/dscf, opacity 30%	6700	0.03	1.72	7.55
12	Grading System B	7.5	Baghouse	0.03 gr/dscf, opacity 30%	6700	0.03	1.72	7.55
13	Grading System B	15	Baghouse	0.03 gr/dscf, opacity 30%	6700	0.03	1.72	7.55
14	Grading System B	7.5	Baghouse	0.03 gr/dscf, opacity 30%	6700	0.03	1.72	7.55
27	Feed Hammermill lift	28	3 Baghouses in parallel	0.03 gr/dscf, opacity 30%	9000	0.03	2.31	10.14
15	Reduction System A	12.5	Baghouse	0.03 gr/dscf, opacity 30%	2470	0.03	0.64	2.78
16	Reduction System B	12.5	Baghouse	0.03 gr/dscf, opacity 30%	2470	0.03	0.64	2.78
17	Germ Recovery System	5	Integral Cyclone + non integral baghouse	0.03 gr/dscf, opacity 30%	3902	0.03	1.00	4.39
18								
19	Coarse Grit Reciever	6.25	Baghouse	0.03 gr/dscf, opacity 30%	3530	0.03	0.82	3.59
20	Brewers Grit Reciever	6.25	Baghouse	0.03 gr/dscf, opacity 30%	3530	0.03	0.82	3.59
21	Flour Reciever	5	Baghouse	0.03 gr/dscf, opacity 30%	2470	0.03	0.57	2.50
22	Flour Reciever	5	Baghouse	0.03 gr/dscf, opacity 30%	3530	0.03	0.82	3.59
23	Granulated Meal Reciever	5	Baghouse	0.03 gr/dscf, opacity 30%	3530	0.03	0.82	3.59
24	Finished Product System	33	Baghouse	0.03 gr/dscf, opacity 30%	13400	0.03	3.45	15.09
25	Soft Meal Reciever	5	Baghouse	0.03 gr/dscf, opacity 30%	3530	0.03	1.94	8.50
26	Reduction System A&B Blowers	12	Baghouse	0.03 gr/dscf, opacity 20%	5200	0.03	1.94	8.50
45	Germ Recovery System Blower	6	Baghouse	0.03 gr/dscf, opacity 30%	3500	0.03	1.94	8.50
28	Feed Blower	8	4 Baghouses in parallel	0.03 gr/dscf, opacity 30%	1400	0.03	0.58	2.54
29	Feed Blower	8	4 Baghouses in parallel	0.03 gr/dscf, opacity 30%	1400	0.03	0.58	2.54
30	Railcar Loadout (Flour)	25	None	0.03 gr/dscf, opacity 30%	NA	0.03	0.36	25.00
D44, 44A, 45, 46,46A	Railcar Loadout (Yellow Goods)	26	None	0.03 gr/dscf, opacity 30%	NA	0.03	0.38	26.00
D47	Feed Loadout	60	None	0.03 gr/dscf, opacity 30%	NA	0.03	0.90	60.00
D-48	Corn Aspiration	55	Baghouse	0.03 gr/dscf, opacity 30%	4000	0.03	1.03	4.51
D-49	Masa Cooker Steam Vent. System	0.417	Cyclone	0.03 gr/dscf, opacity 30%	4500	0.03	1.16	5.07
D-50	Masa Hammermill (2) Dust	15	Baghouse	0.03 gr/dscf, opacity 30%	6700	0.03	1.72	7.55
D-52	9th Floor Filter Reroute	4.5	Baghouse	0.03 gr/dscf, opacity 30%	36000	0.01	3.09	13.52
D-53	Raw Bran Bin Dust Filter	2	Baghouse	0.03 gr/dscf, opacity 30%	400	0.03	0.10	0.45
D-55	Joshi 3 Finished Product Filter Reciever	2	Baghouse	0.03 gr/dscf, opacity 30%	1000	0.03	0.26	1.13
D-54	Joshi 3 Dryer Filter Reciever	2	Baghouse	0.03 gr/dscf, opacity 30%	7000	0.03	1.80	7.88
insig act.	grinding and machining operations	NA	Baghouse	0.03 gr/dscf, opacity 30%	4000	0.03	1.03	4.51
						Total		351.60

Natural Gas Combustion Only
Joshi dryer
Company Name: Cargill, Inc.
Address, City IN Zip: 1730 West Michigan Street, Indianapolis, Indiana 46222-3898
Permit No.: T097-24945-00020
Reviewer: Teresa Freeman
Date: 07/01/10

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.05	18.0

Pollutant

	PM*	PM10*	PM2.5	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	5.7	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.02	0.07	0.05	0.01	0.90	0.05	0.75

*PM emission factor is only filterable PM . PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 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
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
Joshi dryer
Company Name: Cargill, Inc.
Address, City IN Zip: 1730 West Michigan Street, Indianapolis, Indiana 46222-3898
Permit No.: T097-24945-00020
Reviewer: Teresa Freeman
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HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.886E-05	1.077E-05	6.734E-04	1.616E-02	3.053E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.490E-06	9.877E-06	1.257E-05	3.412E-06	1.886E-05

Methodology is the same as previous page.

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

Company Name: Cargill, Inc.
Address, City IN Zip: 1730 West Michigan Street, Indianapolis, Indiana 46222-3898
Permit No.: T097-24945-00020
Reviewer: Teresa Freeman
Date: 07/01/10

Boiler 19 Heat Input Capacity	33.5	MMBtu/hr	S = Weight % Sulfur	0.5

Potential Throughput for Boiler 19	2096.14	kgals/year
	287.71	MMcf/year

		Pollutant						
Emissions Factors	PM	PM-10	PM-2.5	SO2	NOx	VOC	CO	Lead
Distillate Oil (lb/kgal) AP-42	2.0	1.0	1.0	71	20.0	0.56	5.0	5.00E-04
Natural Gas (lbs/MMcf) AP-42	7.6	7.6	7.6	0.6	100	5.5	84	5.00E-04

Boiler 19 (Cleaver Brooks Boiler)	PM	PM-10	PM-2.5	SO2	NOx	VOC	CO	Lead
Potential Emissions (Distillate Fuel)	2.10	1.05	1.05	74.41	20.96	0.58	5.24	5.24E-04
Potential Emissions (Natural Gas)	1.09	1.09	1.09	0.09	14.39	0.79	12.08	7.19E-05

Boiler 19 (Cleaver Brooks Boiler)		PM	PM-10	PM-2.5	SO2	NOx	VOC	CO	Lead
SIP Allowable Emissions in tons/yr (Distillate Oil)		1.00	1.00	1.00	35.50	10.00	0.28	2.50	0.00
SIP Allowable Emissions in tons/yr (Natural Gas)		1.00	1.00	1.00	0.08	13.16	0.72	11.05	0.00
	Max:	1.00	1.00	1.00	35.50	13.16	0.72	11.05	0.00
Limited Throughput for Boiler 19		1000.00	kgals/year	Meets 0.014lb/MMBtu SIP Limit?				0.00745098	lb/MMBtu
		263.16	MMcf/year					yes	
Distillate Fuel Oil Natural Gas Equivalence	0.26	mmcf/kgal							

Methodology

Throughput Calculations: 1 kgal of No. 2 Fuel Oil has a heating value of 140 MMBtu, Natural Gas has a heating value of 1020 Btu/scf.

Emission Factors are from AP 42, Tables 1.3-1 and 1.3-2 (9/98) for Distillate Oil and AP-42, Tables 1.4-1,2,3, and 5 for Natural Gas

Emissions from Distillate Oil Combustion - Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Mark Burianek
Cargill, Inc.
1730 Michigan St
Indianapolis, IN 46222

DATE: February 11, 2011

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Part 70 Operating Permit Renewal
097-24945-00020

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Curt Miller – Facility Manager
Kathy Moore – KERAMIDA Environmental, Inc.
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Commissioner

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(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

February 11, 2011

TO: Indianapolis Central Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: **Cargill, Inc.**
Permit Number: **097-24945-00020**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 2/11/2011 Cargill, Inc. 097-24945-00020 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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1		Mark Burianek Cargill, Inc. 1730 W Michigan St Indianapolis IN 46222 (Source CAATS) via confirmed delivery									
2		Curt Miller Facility Manager Cargill, Inc. 1730 W Michigan St Indianapolis IN 46222 *(RO CAATS)*									
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 *(Health Department)*									
4		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 *(Affected Party)*									
5		Indianapolis Central Library Branch 40 East St. Clair Street Indianapolis IN 46204 *(Library)*									
6		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 *(Local Official)*									
7		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 *(Local Official)*									
8		Ms. Jodi Perras Improving Kids Environment 1111 East 54th Street, Suite 212 Indianapolis IN 46220 *(Affected Party)*									
9		Mrs. Kathy Moore KERAMIDA Environmental, Inc. 401 North College Indianapolis IN 46202 *(Consultant)*									
10		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 *(Local Official)*									
11		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 *(Affected Party)*									
12											
13											
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