

Certified Mail No.: 7007 0710 0005 3965 5155



DATE: August 27, 2008

TO: Interested Parties / Applicant

RE: ADM Milling Company / F097-25351-00016

FROM: Kyle Walker  
Deputy Director, DPW

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 501, Indianapolis, IN 46204, **within fifteen (15) calendar days of the receipt of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Air Quality Hotline: 317-327-4AIR | [knozone.com](http://knozone.com)

Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
Fax 327-2274  
TDD 327-5186  
[indygov.org/dpw](http://indygov.org/dpw)



## Federally Enforceable State Operating Permit Renewal

### Indiana Department of Environmental Management Office of Air Quality And City of Indianapolis Office of Environmental Services

**ADM Milling Company  
854 Bethel Avenue  
Beech Grove, Indiana 46107**

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

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

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

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

Operation Permit No.: F097-25351-00016	
Issued by:  ORIGINAL SIGNED BY  Kyle Walker Deputy Director, DPW	Issuance Date: August 27, 2008  Expiration Date: August 27, 2018



Air Quality Hotline: 317-327-4AIR | knozone.com

**Department of Public Works  
Office of Environmental Services**

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
Fax 327-2274  
TDD 327-5186  
indygov.org/dpw

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

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

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The Permittee owns and operates a stationary grain elevator and a flour and milled wheat process.

Source Address:	854 Bethel Avenue, Beech Grove, Indiana 46107
Mailing Address:	PO Box 610, Beech Grove, IN 46107
General Source Phone Number:	(317) 783-3321
SIC Code:	2041
County Location:	Marion
Source Location Status:	Nonattainment for PM-2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Nonattainment NSR 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 2-8-3(c)(3)]

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

- (a) Grain receiving area, identified as emission unit ES1, constructed in 1992, with a maximum capacity of 750 tons/hr. Grain receiving is separated into areas and enclosures for both truck and railcar receiving. Truck unloading is aspirated to a baghouse, identified as CD1, and exhausting to stack S1. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (b) Grain loadout, identified as emission unit ES2, constructed in 1992, with a maximum capacity of 900 tons/hr. Grain loadout is separated into areas and enclosures for both truck and railcar loadout. Railcar loading is aspirated to a baghouse, identified as CD2, and exhausting to stack S2. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (c) Grain storage and handling, identified as emission unit ES3, constructed in 1992 and consists of 123 bins, conveyors, transfer points and the grain dryer, with a maximum capacity for grain handling of 750 tons/hr. 123 bins have a total storage capacity of 5,835,000 bushels, and are controlled by three (3) baghouses, identified as CD3, CD4, and CD5, and exhausting to stacks S3, S4 and S5, respectively. The grain dryer is fired with natural gas and has a heat input capacity of 19.98 MMBtu per hour. The maximum throughput capacity for the grain dryer is 56 tons per hour. Fugitive emissions from grain handling are controlled by enclosed conveyors and transfer points.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (d) Cleaning house, identified as emission unit ES4, constructed in 1992, with a maximum capacity of 45 tons/hr. The wheat cleaning house is controlled by seven (7) baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, and CD12, and exhausting to stacks S6, S7, S8, S9, S10, S11 and S12, respectively.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (e) Mill house, identified as emission unit ES5, constructed in 1992, with a maximum capacity of 45 tons/hr. The mill house consists of skimmers, stream blenders, purifiers, rollstands, stock hoppers, pinmills, and hammermills. The mill house is controlled by twelve (12) baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, and CD24, and exhausting to stacks S13, S14, S15, S16, S17, S18, S19, S20, S21, S22, S23 and S24, respectively.
- (f) Bulk plant and product loadout, identified as emission unit ES6, constructed in 1992, with a maximum capacity of 32 tons/hr. The flour bulk plant includes a bagging operation, loadout bins, sifters, and scales, with an enclosed loadout area for bulk shipment via trucks and railcars. Bulk plant and product loadout is controlled by seven (7) baghouses, identified as CD25, CD26, CD27, CD28, CD29, CD30, and CD31, and exhausting to stacks S25, S26, S27, S28, S29, S30 and S31, respectively.
- (g) Mill feed storage, handling and loadout, identified as emission unit ES7, constructed in 1992, with a maximum capacity of 120 tons/hr, and consisting of screening bins, feed bins, conveying and loadout. The mill feed storage, handling and loadout is controlled by five (5) baghouses, identified as CD32, CD33, CD34, CD35, and CD36, and exhausting to stacks S32, S33, S34, S35 and S36, respectively.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour (326 IAC 6-2-4), consisting of:
  - (1) Boiler #1, with a maximum heat input capacity of 5.0 MMBtu/hr,
  - (2) Boiler #2, with a maximum heat input capacity of 5.0 MMBtu/hr,
  - (3) Boiler #3, with a maximum heat input capacity of 3.3 MMBtu/hr.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank of less than 10,500 gallon capacity, and dispensing less than 230,000 gallons per month;
- (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Degreasing operations that do not exceed 145 gallons per 12 months (326 IAC 8-3-2) (326 IAC 8-3-5);
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other filtration equipment;
- (f) Paved and unpaved roads and parking lots with public access (326 IAC 6-4);
- (g) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling

tower; and

(h) A laboratory as defined in 326 IAC 2-7-1(21)(D).

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

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

## **SECTION B GENERAL CONDITIONS**

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

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

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

- 
- (a) This permit, F097-25351-00016, is issued for a fixed term of ten (10) 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 and OES, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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- (a) The Permittee shall furnish to IDEM, OAQ and OES, within a reasonable time, any information that IDEM, OAQ and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and OES 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 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

and

Indianapolis Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

- (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 and OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and OES may require to determine the compliance status of the source.

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

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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

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

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

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

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

Office of Environmental Services phone: (317) 327-2234; fax: (317) 327-2274

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

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

and

Indianapolis Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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- (a) All terms and conditions of permits established prior to F097-25351-00016 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

and

Indianapolis Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

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

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

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

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

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

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ and OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ and OES may provide a shorter time period in the case of an emergency.  
[326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

and

Indianapolis Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

- (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 and OES on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and OES any additional information identified as being needed to process the application.

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

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

Indianapolis Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

Indianapolis Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

Indianapolis Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ and OES 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 and OES the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.
- (c) The potential to emit particulate matter less than 2.5 microns (PM-2.5) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review (NSR)) not applicable.
- (d) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (e) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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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.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 Stack Height [326 IAC 1-7]

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

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

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

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

#### **C.8 Performance Testing [326 IAC 3-6]**

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

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

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

and

Indianapolis Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and OES 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.9 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

##### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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

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

and

Indianapolis Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

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

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

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

**C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

---

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

**C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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

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

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

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

**C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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

- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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

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

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

**C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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

**C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported.

This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

and

Indianapolis Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

- (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 and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Grain receiving area, identified as emission unit ES1, constructed in 1992, with a maximum capacity of 750 tons/hr. Grain receiving is separated into areas and enclosures for both truck and railcar receiving. Truck unloading is aspirated to a baghouse, identified as CD1, and exhausting to stack S1. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (b) Grain loadout, identified as emission unit ES2, constructed in 1992, with a maximum capacity of 900 tons/hr. Grain loadout is separated into areas and enclosures for both truck and railcar loadout. Railcar loading is aspirated to a baghouse, identified as CD2, and exhausting to stack S2. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (c) Grain storage and handling, identified as emission unit ES3, constructed in 1992 and consists of 123 bins, conveyors, transfer points and the grain dryer, with a maximum capacity for grain handling of 750 tons/hr. 123 bins have a total storage capacity of 5,835,000 bushels, and are controlled by three (3) baghouses, identified as CD3, CD4, and CD5, and exhausting to stacks S3, S4 and S5, respectively. The grain dryer is fired with natural gas and has a heat input capacity of 19.98 MMBtu per hour. The maximum throughput capacity for the grain dryer is 56 tons per hour. Fugitive emissions from grain handling are controlled by enclosed conveyors and transfer points.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (d) Cleaning house, identified as emission unit ES4, constructed in 1992, with a maximum capacity of 45 tons/hr. The wheat cleaning house is controlled by seven (7) baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, and CD12, and exhausting to stacks S6, S7, S8, S9, S10, S11 and S12, respectively.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

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

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

#### D.1.1 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4, the allowable PM/PM-10/PM-2.5 emissions shall be limited as follows:

- (a) The emission rate from the truck receiving baghouse CD1, truck loadout baghouse CD2, and grain storage and handling baghouses CD3, CD4 and CD5, shall each not exceed 0.01 grain/dscf.

- (b) All grain receiving and loadout operations shall be conducted such that fugitive emissions are controlled by the three-sided enclosure.
- (c) The throughput of grain received (ES1) shall be limited to 1,716,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) The throughput of grain loaded out (ES2) shall be limited to 1,560,000 tons of grain per twelve (12) consecutive month period with compliance determined at the end of each month.
- (e) The emission rate from the cleaning house, identified as ES4, and controlled by seven (7) baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, and CD12, shall each not exceed 0.005 grain/dscf.

Compliance with the above limits, combined with the limits from D.2.1 and the potential emissions from all other units will limit source-wide PM/PM-10/PM-2.5 emissions to less than 100 tons per twelve (12) consecutive month period. Therefore the requirements of 326 IAC 2-7, 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) are not applicable.

#### D.1.2 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(d), the following shall apply to the grain receiving area, identified as emission unit ES1, the grain loadout area, identified as emission unit ES2, and the grain storage and handling areas, identified as emission unit ES3, as follows:

- (a) For any grain storage elevator located at any grain processing source that has a permanent grain storage capacity of thirty-five thousand two hundred (35,200) cubic meters (one million (1,000,000) U.S. bushels) or more shall be limited to particulate matter emissions of no greater than seven-hundredths (0.07) g/dscm (three hundredths (0.03) grain per dscf).
- (b) All grain elevators subject to this article shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:
  - (1) Housekeeping practices shall be conducted as follows:
    - (a) Areas to be swept and maintained shall include, at a minimum, the following:
      - (i) General grounds, yard, and other open areas.
      - (ii) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
      - (iii) Grain driers with respect to accumulated particulate matter.
    - (b) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
    - (c) Dust from driveways, access roads, and other areas of travel shall be controlled.
    - (d) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

- (2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
  - (a) Malfunctions.
  - (b) Breakdowns.
  - (c) Improper adjustment.
  - (d) Operating above the rated or designed capacity.
  - (e) Not following designed operating specifications.
  - (f) Lack of good preventive maintenance care.
  - (g) Lack of critical and proper spare replacement parts on hand.
  - (h) Lack of properly trained and experienced personnel.
- (3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### **Compliance Determination Requirements**

#### D.1.4 Particulate Control

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- (a) The baghouses (CD1 through 12) for PM, PM-10 and PM-2.5 control shall be in operation and control emissions from ES1, ES2, ES3 and ES4 at all times that these facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify OES of the expected date the failed units will be repaired or replace. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.1.5 Testing Requirements [326 IAC 2-1.1-11]

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Within 180 days after issuance of this permit (F097-25351-00016), in order to determine compliance with Condition D.1.1, the Permittee shall perform PM and PM-10 emission stack testing for operation ES1, ES2, and ES3, utilizing the methods as approved by the IDEM, OAQ, and OES. This testing shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.

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

#### D.1.6 Visible Emissions Notations

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- (a) Visible emission notations of the baghouse exhausts associated with ES1, ES2, ES3 and ES4, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

#### D.1.7 Parametric Monitoring

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The Permittee shall record the pressure drop across baghouse CD1 through 12, used in conjunction with ES1, ES2, ES3 and ES4, at least once per day when this process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

#### D.1.8 Broken or Failed Bag Detection

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In the event that bag failure has been observed:

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

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

#### D.1.9 Record Keeping Requirement

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- (a) To document compliance with Condition D.1.1(c), the Permittee shall maintain records of the amount of grain received per twelve (12) consecutive month period. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the particulate emission limits established in Condition D.1.1.

- (b) To document compliance with Condition D.1.1(d), the Permittee shall maintain records of the amount of grain loaded out per twelve (12) consecutive month period. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the particulate emission limits established in Condition D.1.1.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of ES1, ES2, ES3 and ES4. 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, (i.e. the process did not operate that day).
- (d) To document compliance with Condition D.1.7, the Permittee shall maintain records once per day of the pressure drop across the baghouse controlling ES1, ES2, ES3 and ES4. 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, (i.e. the process did not operate that day).
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]**

**D.1.10 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]**

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Pursuant to 40 CFR 60.300, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, except when otherwise specified in 40 CFR Part 60, Subpart DD.

**D.1.11 New Source Performance Standards (NSPS) Standards of Performance for Grain Elevators [326 IAC 12][40 CFR Part 60, Subpart DD]**

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The Permittee which operates a grain elevator shall comply with the following provisions of 40 CFR Part 60, Subpart DD (included as Attachment A of this permit):

- (1) 40 CFR 60.300
- (2) 40 CFR 60.301
- (3) 40 CFR 60.302
- (4) 40 CFR 60.303
- (5) 40 CFR 60.304

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (e) Mill house, identified as emission unit ES5, constructed in 1992, with a maximum capacity of 45 tons/hr. The mill house consists of skimmers, stream blenders, purifiers, rollstands, stock hoppers, pinmills, and hammermills. The mill house is controlled by twelve (12) baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, and CD24, and exhausting to stacks S13, S14, S15, S16, S17, S18, S19, S20, S21, S22, S23 and S24, respectively.
- (f) Bulk plant and product loadout, identified as emission unit ES6, constructed in 1992, with a maximum capacity of 32 tons/hr. The flour bulk plant includes a bagging operation, loadout bins, sifters, and scales, with an enclosed loadout area for bulk shipment via trucks and railcars. Bulk plant and product loadout is controlled by seven (7) baghouses, identified as CD25, CD26, CD27, CD28, CD29, CD30, and CD31, and exhausting to stacks S25, S26, S27, S28, S29, S30 and S31, respectively.
- (g) Mill feed storage, handling and loadout, identified as emission unit ES7, constructed in 1992, with a maximum capacity of 120 tons/hr, and consisting of screening bins, feed bins, conveying and loadout. The mill feed storage, handling and loadout is controlled by five (5) baghouses, identified as CD32, CD33, CD34, CD35, and CD36, and exhausting to stacks S32, S33, S34, S35 and S36, respectively.

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

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

#### D.2.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate (PM) emissions from the mill house (identified as ES5), the bulk plant and product loadout (identified as ES6), and mill feed storage, handling and loadout (identified as ES7) shall not exceed three hundredths (0.03) grains per dry standard cubic foot of exhaust air.

#### D.2.2 FESOP Limits [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4, the allowable PM/PM-10/PM-2.5 emissions shall be limited as follows:

- (a) The emission rate from the mill house, identified as ES5, and controlled by twelve (12) baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, and CD24, shall each not exceed 0.005 grain/dscf.
- (b) The emission rate from the bulk plant and product loadout, identified as ES6, and controlled seven (7) baghouses, identified as CD25, CD26, CD27, CD28, CD29, CD30, and CD31, shall each not exceed 0.005 grain/dscf.
- (c) The emission rate from the mill feed storage and handling, identified as ES7, and controlled by four (4) baghouses, identified as CD32, CD33, CD34, and CD35, shall each not exceed 0.01 grain/dscf.
- (d) All mill feed loadout operations shall be conducted such that fugitive emissions are controlled by a three-sided enclosure.

- (e) The throughput of mill feed loaded out shall be limited to 249,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits, combined with the limits from D.1.1 and the potential emissions from all other units will limit source-wide PM/PM-10/PM-2.5 emissions to less than 100 tons per twelve (12) consecutive month period. Therefore the requirements of 326 IAC 2-7, 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) are not applicable.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.2.4 Particulate Control

---

- (a) The baghouses (CD13 - CD35) for PM, PM-10 and PM-2.5 control shall be in operation and control emissions from ES5, ES6 and ES7 at all times that these facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify OES of the expected date the failed units will be repaired or replace. 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 2-8-4][326 IAC 2-8-5(a)(1)]

#### D.2.5 Visible Emissions Notations

---

- (a) Visible emission notations of the baghouse exhausts associated with ES5, ES6 and ES7 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.2.6 Parametric Monitoring

---

The Permittee shall record the pressure drop across baghouses CD13 – CD35, used in conjunction with ES5, ES6 and ES7, at least once per day when these processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test,

the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

#### D.2.7 Broken or Failed Bag Detection

---

In the event that bag failure has been observed:

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

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

#### D.2.8 Record Keeping Requirement

---

- (a) To document compliance with Condition D.2.1(e), the Permittee shall maintain records of the amount of mill feed loaded out per twelve (12) consecutive month period. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the particulate emission limits established in Condition D.2.1.
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of ES5, ES6 and ES7. 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, (i.e. the process did not operate that day).
- (c) To document compliance with Condition D.2.5, the Permittee shall maintain records once per day of the pressure drop across the baghouses controlling ES5, ES6 and ES7. 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, (i.e. the process did not operate that day).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour (326 IAC 6-2-4), consisting of:
  - (1) Boiler #1, with a maximum heat input capacity of 5.0 MMBtu/hr,
  - (2) Boiler #2, with a maximum heat input capacity of 5.0 MMBtu/hr,
  - (3) Boiler #3, with a maximum heat input capacity of 3.3 MMBtu/hr.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months.

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

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

##### D.3.1 Particulate Emission Limitations for Sources of Indirect Heating (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the two (2) 5.0 MMBtu per hour heat input boilers and one (1) 3.3 MMBtu per hour boiler shall be limited to 0.54 pounds per hour.

##### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operating requirement;
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

##### D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility 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 ( $38^{\circ}\text{C}$ ) (one hundred degrees Fahrenheit ( $100^{\circ}\text{F}$ ));
  - (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 ( $38^{\circ}\text{C}$ ) (one hundred degrees Fahrenheit ( $100^{\circ}\text{F}$ )), 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 ( $38^{\circ}\text{C}$ ) (one hundred degrees Fahrenheit ( $100^{\circ}\text{F}$ )), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ( $48.9^{\circ}\text{C}$ ) (one hundred twenty degrees Fahrenheit ( $120^{\circ}\text{F}$ )):
- (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 or 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), the owner or operator of a cold cleaning facility 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  
and  
CITY OF INDIANAPOLIS  
OFFICE of ENVIRONMENTAL SERVICES**

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

Source Name: ADM Milling Company  
Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107  
Mailing Address: PO Box 610, Beech Grove, IN 46107  
FESOP Permit No.: F097-25351-00016

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**CITY OF INDIANAPOLIS  
OFFICE of ENVIRONMENTAL SERVICES  
DATA COMPLIANCE  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221  
Phone:317-327-2234  
Fax:317-327-2274**

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

Source Name: ADM Milling Company  
Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107  
Mailing Address: PO Box 610, Beech Grove, IN 46107  
FESOP Permit No.: F097-25351-00016

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_

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

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

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

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 and  
 CITY OF INDIANAPOLIS  
 OFFICE of ENVIRONMENTAL SERVICES**

**FESOP Quarterly Report**

Source Name: ADM Milling Company  
 Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107  
 Mailing Address: PO Box 610, Beech Grove, IN 46107  
 FESOP Permit No.: F097-25351-00016  
 Facility: ES1 - Grain Receiving  
 Parameter: PM-10 / PM-2.5 emissions  
 Limit: The throughput of grain received is restricted to 1,716,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month

**Quarter:** \_\_\_\_\_ **Year:** \_\_\_\_\_

Month	Grain Received	Grain Received	Grain Received
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 and  
 CITY OF INDIANAPOLIS  
 OFFICE of ENVIRONMENTAL SERVICES**

**FESOP Quarterly Report**

Source Name: ADM Milling Company  
 Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107  
 Mailing Address: PO Box 610, Beech Grove, IN 46107  
 FESOP Permit No.: F097-25351-00016  
 Facility: ES2 - Grain Loadout  
 Parameter: PM-10 / PM-2.5 emissions  
 Limit: The throughput of grain loaded out is restricted to 1,560,000 tons of grain per twelve (12) consecutive month period with compliance determined at the end of each month.

**Quarter:** \_\_\_\_\_ **Year:** \_\_\_\_\_

Month	Grain Loadout	Grain Loadout	Grain Loadout
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 and  
 CITY OF INDIANAPOLIS  
 OFFICE of ENVIRONMENTAL SERVICES**

**FESOP Quarterly Report**

Source Name: ADM Milling Company  
 Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107  
 Mailing Address: PO Box 610, Beech Grove, IN 46107  
 FESOP Permit No.: F097-25351-00016  
 Facility: ES7 - Mill feed loadout  
 Parameter: PM-10 / PM-2.5 emissions  
 Limit: The throughput of mill feed loaded out is restricted to 249,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Quarter: \_\_\_\_\_ Year: \_\_\_\_\_

Month	Mill feed loadout	Mill feed loadout	Mill feed loadout
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 and  
 CITY OF INDIANAPOLIS  
 OFFICE of ENVIRONMENTAL SERVICES**

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

Source Name: ADM Milling Company  
 Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107  
 Mailing Address: PO Box 610, Beech Grove, IN 46107  
 FESOP Permit No.: F097-25351-00016

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

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

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

Form Completed by: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

## **ATTACHMENT A**

### **40 CFR Part 60 Subpart DD New Source Performance Standards for Grain Elevators**

## Subpart DD—Standards of Performance for Grain Elevators

**Source:** 43 FR 34347, Aug. 3, 1978, unless otherwise noted.

### **§ 60.300 *Applicability and designation of affected facility.***

(a) The provisions of this subpart apply to each affected facility at any grain terminal elevator or any grain storage elevator, except as provided under §60.304(b). The affected facilities are each truck unloading station, truck loading station, barge and ship unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations.

(b) Any facility under paragraph (a) of this section which commences construction, modification, or reconstruction after August 3, 1978, is subject to the requirements of this part.

[43 FR 34347, Aug. 3, 1978, as amended at 52 FR 42434, Nov. 5, 1988]

### **§ 60.301 *Definitions.***

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.

(a) *Grain* means corn, wheat, sorghum, rice, rye, oats, barley, and soybeans.

(b) *Grain elevator* means any plant or installation at which grain is unloaded, handled, cleaned, dried, stored, or loaded.

(c) *Grain terminal elevator* means any grain elevator which has a permanent storage capacity of more than 88,100 m<sup>3</sup> (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots.

(d) *Permanent storage capacity* means grain storage capacity which is inside a building, bin, or silo.

(e) *Railcar* means railroad hopper car or boxcar.

(f) *Grain storage elevator* means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 35,200 m<sup>3</sup> (ca. 1 million bushels).

(g) *Process emission* means the particulate matter which is collected by a capture system.

(h) *Fugitive emission* means the particulate matter which is not collected by a capture system and is released directly into the atmosphere from an affected facility at a grain elevator.

(i) *Capture system* means the equipment such as sheds, hoods, ducts, fans, dampers, etc. used to collect particulate matter generated by an affected facility at a grain elevator.

(j) *Grain unloading station* means that portion of a grain elevator where the grain is transferred from a truck, railcar, barge, or ship to a receiving hopper.

(k) *Grain loading station* means that portion of a grain elevator where the grain is transferred from the elevator to a truck, railcar, barge, or ship.

(l) *Grain handling operations* include bucket elevators or legs (excluding legs used to unload barges or ships), scale hoppers and surge bins (garners), turn heads, scalpers, cleaners, trippers, and the headhouse and other such structures.

(m) *Column dryer* means any equipment used to reduce the moisture content of grain in which the grain flows from the top to the bottom in one or more continuous packed columns between two perforated metal sheets.

(n) *Rack dryer* means any equipment used to reduce the moisture content of grain in which the grain flows from the top to the bottom in a cascading flow around rows of baffles (racks).

(o) *Unloading leg* means a device which includes a bucket-type elevator which is used to remove grain from a barge or ship.

[43 FR 34347, Aug. 3, 1978, as amended at 65 FR 61759, Oct. 17, 2000]

**§ 60.302 Standard for particulate matter.**

(a) On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any gases which exhibit greater than 0 percent opacity from any:

- (1) Column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch).
- (2) Rack dryer in which exhaust gases pass through a screen filter coarser than 50 mesh.

(b) On and after the date on which the performance test required to be conducted by §60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:

- (1) Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf).
- (2) Exhibits greater than 0 percent opacity.

(c) On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from:

- (1) Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.
- (2) Any grain handling operation which exhibits greater than 0 percent opacity.
- (3) Any truck loading station which exhibits greater than 10 percent opacity.
- (4) Any barge or ship loading station which exhibits greater than 20 percent opacity.

(d) The owner or operator of any barge or ship unloading station shall operate as follows:

- (1) The unloading leg shall be enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device shall be maintained on both sides of the leg and the grain receiving hopper.
- (2) The total rate of air ventilated shall be at least 32.1 actual cubic meters per cubic meter of grain handling capacity (ca. 40 ft<sup>3</sup> /bu).
- (3) Rather than meet the requirements of paragraphs (d)(1) and (2) of this section the owner or operator may use other methods of emission control if it is demonstrated to the Administrator's satisfaction that they would reduce emissions of particulate matter to the same level or less.

**§ 60.303 Test methods and procedures.**

(a) In conducting the performance tests required in §60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b). Acceptable alternative methods and procedures are given in paragraph (c) of this section.

(b) The owner or operator shall determine compliance with the particulate matter standards in §60.302 as follows:

(1) Method 5 shall be used to determine the particulate matter concentration and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 1.70 dscm (60 dscf). The probe and filter holder shall be operated without heaters.

(2) Method 2 shall be used to determine the ventilation volumetric flow rate.

(3) Method 9 and the procedures in §60.11 shall be used to determine opacity.

(c) The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:

(1) For Method 5, Method 17 may be used.

[54 FR 6674, Feb. 14, 1989]

**§ 60.304 Modifications.**

(a) The factor 6.5 shall be used in place of "annual asset guidelines repair allowance percentage," to determine whether a capital expenditure as defined by §60.2 has been made to an existing facility.

(b) The following physical changes or changes in the method of operation shall not by themselves be considered a modification of any existing facility:

(1) The addition of gravity loadout spouts to existing grain storage or grain transfer bins.

(2) The installation of automatic grain weighing scales.

(3) Replacement of motor and drive units driving existing grain handling equipment.

(4) The installation of permanent storage capacity with no increase in hourly grain handling capacity.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City of Indianapolis  
Office of Environmental Services**

**Addendum to the Technical Support Document  
for a Significant Source Modification**

<b>Source Name:</b>	ADM Milling Company
<b>Source Location:</b>	854 Bethel Avenue, Beech Grove, IN 46107
<b>County:</b>	Marion
<b>SIC Code:</b>	2041
<b>Operation Permit No.:</b>	F097-25351-00016
<b>Permit Reviewer:</b>	Jeffrey Hege

On June 14, 2008, the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that ADM Milling Company, had applied for a renewal of their Federally Enforceable State Operating Permit (FESOP). The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ and OES have decided to make the following revisions to the Federally Enforceable State Operating Permit (FESOP). The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has published for public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Bolded language has been added and the language with strikethrough has been deleted. The Table of Contents has been modified to reflect these changes.

**IDEM and OES Change 1:**

Marion County has been classified as nonattainment for PM-2.5 in 70 FR 943 dated January 5, 2005. On May 8<sup>th</sup>, 2008, U.S. EPA promulgated specific New Source Review rules for PM-2.5 emissions, and the effective date of these rules was July 15<sup>th</sup>, 2008. Therefore, direct PM-2.5 and SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Non-attainment New Source Review, 326 IAC 2-1.1-5. This existing source is not a major stationary source, under Non-attainment New Source Review (326 IAC 2-1.1-5), because the limited potential to emit of PM-2.5 and SO<sub>2</sub> after issuance are each less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Non-attainment New Source Review requirements do not apply. However, the potential to emit PM-2.5 must be included in the Potential to Emit after issuance table (assuming PM-2.5 emissions are equivalent to PM-10 emissions).

Fugitive emissions from paved and unpaved roads at the facility had not previously been quantified and included in the FESOP. These emissions were calculated (see attached ATSD calculations) and included in the Potential To Emit After Issuance table (the source only has paved roadways, there are no unpaved roadways at the facility). The table is revised in this Addendum as follows:

Process/Emission Unit/Control Device	Potential To Emit After Issuance (tons/year)								
	PM	PM-10*	PM-2.5 *	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Highest Single HAP	Combined HAP
Grain Receiving (truck) - ES1 / CD1	6.80	6.80	<b>6.80</b>	-	-	-	-	-	-
Grain Loadout - ES2 / CD2	3.17	3.17	<b>3.17</b>	-	-	-	-	-	-
Grain Storage & Handling - ES3 / CD3 - CD5	28.31	28.31	<b>28.31</b>	-	-	-	-	-	-
Cleaning House - ES4 / CD6 - CD12	8.45	8.45	<b>8.45</b>	-	-	-	-	-	-
Mill House - ES5 / CD13 - CD24	20.46	20.46	<b>20.46</b>	-	-	-	-	-	-
Bulk Plant and Product Loadout - ES6 / CD25 - CD31	6.57	6.57	<b>6.57</b>	-	-	-	-	-	-
Feed Storage, Handling & Loadout - ES7 / CD32 - CD35	3.45	3.45	<b>3.45</b>	-	-	-	-	-	-
<b>Fugitives</b>									
Railcar Grain Receiving Fug1)	2.68	2.68	<b>2.68</b>	-	-	-	-	-	-
Truck Grain Loadout (Fug2)	9.05	9.05	<b>9.05</b>	-	-	-	-	-	-
Elevator Bin Vents (Fug3)	5.41	5.41	<b>5.41</b>	-	-	-	-	-	-
Feed Loadout (Fug5)	0.02	0.02	<b>0.02</b>	-	-	-	-	-	-
<b>Paved Roads (Fug6)</b>	<b>0.53</b>	<b>0.10</b>	<b>0.10</b>	-	-	-	-	-	-
<b>Insignificant Activities</b>									
Boiler #1	0.04	0.04	0.04	0.01	0.12	1.84	2.19	0.039 (hexane)	0.041
Boiler #2	0.04	0.04	0.04	0.01	0.12	1.84	2.19	0.039 (hexane)	0.041
Boiler #3	0.03	0.03	0.03	0.01	0.08	1.84	1.45	0.026 (hexane)	0.027
Degreasers					0.48				
<b>Title V</b>									
Major Source Thresholds	NA	100	<b>100</b>	100	100	100	100	10	25
PSD & Nonattainment NSR									
Major Source Thresholds	250	<del>100</del> <b>250</b>	<b>100</b>	250	250	250	250	NA	NA
<b>Total Emissions</b>	94.48 <b>95.01</b>	94.48 <b>94.58</b>	<b>94.58</b>	0.03	0.80	4.89	5.83	0.039 (hexane)	0.11

\* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". ~~US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.~~

(a) The General Information section of the permit has been updated to reflect this change in attainment status in condition A.1, as follows:

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

The Permittee owns and operates a stationary grain elevator and a flour and milled wheat process.

Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107  
 Mailing Address: PO Box 610, Beech Grove, IN 46107  
 General Source Phone No.: (317) 783 3321  
 SIC Code: 2041  
 County Location: Marion  
 Source Location Status: Nonattainment for PM-2.5 standard  
 Attainment for all other criteria pollutants  
 Source Status: Federally Enforceable State Operating Permit Program  
 Minor Source, under PSD and **Nonattainment NSR**  
 Minor Source, Section 112 of the Clean Air Act  
 Not 1 of 28 Source Categories

- (b) The various particulate limits at the source have been updated to include limits for PM-2.5. For the purposes of this review PM-2.5 was assumed to be equal to PM-10. The various limits were updated, as follows:

D.1.1 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4, the allowable PM/PM-10/**PM-2.5** emissions shall be limited as follows:

....

Compliance with the above limits, combined with the limits from D.2.1 and the potential emissions from all other units will limit source-wide PM/PM-10/**PM-2.5** emissions to less than 100 tons per twelve (12) consecutive month period. Therefore the requirements of 326 IAC 2-7, 326 IAC 2-2 (PSD) and **326 IAC 2-1.1-5 (Nonattainment NSR)** are not applicable...

....

Compliance Determination Requirements

D.1.4 Particulate Control

- (a) The baghouses (CD1 through 12) for PM, ~~and~~ PM-10 **and PM-2.5** control shall be in operation and control emissions from ES1, ES2, ES3 and ES4 at all times that these facilities are in operation.

....

D.2.2 FESOP Limits [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4, the allowable PM/PM-10/**PM-2.5** emissions shall be limited as follows:

....

Compliance with the above limits, combined with the limits from D.1.1 and the potential emissions from all other units will limit source-wide PM/PM-10/**PM-2.5** emissions to less than 100 tons per twelve (12) consecutive month period. Therefore the requirements of 326 IAC 2-7, 326 IAC 2-2 (PSD) **and 326 IAC 2-1.1-5 (Nonattainment NSR)** are not applicable.

....

Compliance Determination Requirements

D.2.4 Particulate Control

- (a) The baghouses (CD13 - CD35) for PM, PM-10 **and PM-2.5** control shall be in operation and control emissions from ES5, ES6 and ES7 at all times that these facilities are in operation.

- (c) The Overall Source Limit condition (C.1) was updated to reflect the change in attainment status, as follows:

C.1 Overall Source Limit [326 IAC 2 8]

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

- (a) Pursuant to 326 IAC 2 8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.
- (c) The potential to emit particulate matter less than 2.5 microns (PM-2.5) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review (NSR)) not applicable.**
- (d) ~~(e)~~ This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2 7 1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (e) ~~(d)~~ Section D of this permit contains independently enforceable provisions to satisfy this requirement.

Uncontrolled Potential to Emit PM10 and PM from Vehicle Travel on Paved Roads

**Company Name:** ADM Milling Company  
**Street Address:** 854 Bethel Avenue, Beech Grove, Indiana, 46107  
**County:** Marion  
**FESOP No.:** F097-25351-00016  
**Reviewer:** Jeffrey Hege

**Particulate Emissions**

$E = [k * (s/2)^{0.65} * (W/3)^{1.5}] - c$  = lb particulate/vehicle mile traveled on paved roads  
 (AP-42 (November 2006), Chapter 13.2.1.3)

k =	38	particle size multiplier for particulate (constant)
s =	0.015	silt content of road surface material (%), unspecified municipal roads
P =	120	number of days with at least 0.01 inch of precipitation (per year)
c =	0.2119	emission factor for 1980's vehicle fleet exhaust, break wear and tire wear
W =	See below	mean vehicle weight (tons)

Vehicle Type	Mean Speed (mph)	Mean Weight (tons)	Trip (mi) Distance	# Trips per Hour	Total Miles (One Day)	Day/Year	E (lb/VMT)	PM10 (ton/yr)
Trucks	15 Mph	20	0.4	1.6	15.36	365	0.15	0.41
Cars	15 Mph	1.5	0.2	2.9	13.92	365	0.05	0.12
<b>Total fugitive emissions =</b>							<b>0.53</b>	
<b>Fugitive emission control =</b>							<b>0.00%</b>	
<b>Total fugitive emissions =</b>							<b>0.00</b>	

**Methodology**

PM/PM10 emissions (tons/yr) = total miles travelled per day x 365 days per year x E (emission factor lb/VMT)  
 See Fugitive Dust Control Plan for control measures.

**PM-10 / PM-2.5 Emissions**

$E = [k * (s/2)^{0.65} * (W/3)^{1.5}] - c$  = lb particulate/vehicle mile traveled on paved roads  
 (AP-42 (November 2006), Chapter 13.2.1.3)

k =	7.3	particle size multiplier for particulate (constant)
s =	0.015	silt content of road surface material (%), unspecified municipal roads
P =	120	number of days with at least 0.01 inch of precipitation (per year)
c =	0.2119	emission factor for 1980's vehicle fleet exhaust, break wear and tire wear
W =	See below	mean vehicle weight (tons)

Vehicle Type	Mean Speed (mph)	Mean Weight (tons)	Trip (mi) Distance	# Trips per Hour	Total Miles (One Day)	Day/Year	E (lb/VMT)	PM10 (ton/yr)
Trucks	15 Mph	20	0.4	1.6	15.36	365	0.03	0.08
Cars	15 Mph	1.5	0.2	2.9	13.92	365	0.01	0.02
<b>Total fugitive PM-10/PM-2.5 emissions =</b>							<b>0.10</b>	
<b>Fugitive emission control =</b>							<b>0.00%</b>	
<b>Total fugitive emissions =</b>							<b>0.00</b>	

**Methodology**

PM/PM10 emissions (tons/yr) = total miles travelled per day x 365 days per year x E (emission factor lb/VMT)  
 See Fugitive Dust Control Plan for control measures.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Indianapolis Office of Environmental Services**

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

**Source Background and Description**

<b>Source Name:</b>	ADM Milling Company
<b>Source Location:</b>	854 Bethel Avenue, Beech Grove, Indiana 46107
<b>County:</b>	Marion
<b>SIC Code:</b>	2041
<b>Permit Renewal No.:</b>	F097-25351-00016
<b>Permit Reviewer:</b>	Jeffrey Hege

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed a FESOP renewal application from the ADM Milling Company relating to the operation of a grain elevator and a flour and milled wheat process.

**History**

On September 27, 2007, ADM Milling Company submitted an application to the Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) requesting to renew its operating permit. ADM Milling Company was issued a Federally Enforceable State Operating Permit Renewal (F097-14650-00016) on July 21, 2003.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) Grain receiving area, identified as emission unit ES1, constructed in 1992, with a maximum capacity of 750 tons/hr. Grain receiving is separated into areas and enclosures for both truck and railcar receiving. Truck unloading is aspirated to a baghouse, identified as CD1, and exhausting to stack S1. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (b) Grain loadout, identified as emission unit ES2, constructed in 1992, with a maximum capacity of 900 tons/hr. Grain loadout is separated into areas and enclosures for both truck and railcar loadout. Railcar loading is aspirated to a baghouse, identified as CD2, and exhausting to stack S2. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (c) Grain storage and handling, identified as emission unit ES3, constructed in 1992 and consists of 123 bins, conveyors, transfer points and the grain dryer, with a maximum capacity for grain handling of 750 tons/hr. 123 bins have a total storage capacity of 5,835,000 bushels, and are controlled by three (3) baghouses, identified as CD3, CD4, and CD5, and exhausting to stacks S3, S4 and S5, respectively. The grain dryer is fired with natural gas and has a heat input capacity of 19.98 MMBtu per hour. The maximum throughput capacity for the grain dryer is 56 tons per hour. Fugitive emissions from grain handling are controlled by enclosed conveyors and transfer points.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (d) Cleaning house, identified as emission unit ES4, constructed in 1992, with a maximum capacity of 45 tons/hr. The wheat cleaning house is controlled by seven (7) baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, and CD12, and exhausting to stacks S6, S7, S8, S9, S10, S11 and S12, respectively.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (e) Mill house, identified as emission unit ES5, constructed in 1992, with a maximum capacity of 45 tons/hr. The mill house consists of skimmers, stream blenders, purifiers, rollstands, stock hoppers, pinmills, and hammermills. The mill house is controlled by twelve (12) baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, and CD24, and exhausting to stacks S13, S14, S15, S16, S17, S18, S19, S20, S21, S22, S23 and S24, respectively.
- (f) Bulk plant and product loadout, identified as emission unit ES6, constructed in 1992, with a maximum capacity of 32 tons/hr. The flour bulk plant includes a bagging operation, loadout bins, sifters, and scales, with an enclosed loadout area for bulk shipment via trucks and railcars. Bulk plant and product loadout is controlled by seven (7) baghouses, identified as CD25, CD26, CD27, CD28, CD29, CD30, and CD31, and exhausting to stacks S25, S26, S27, S28, S29, S30 and S31, respectively.
- (g) Mill feed storage, handling and loadout, identified as emission unit ES7, constructed in 1992, with a maximum capacity of 120 tons/hr, and consisting of screening bins, feed bins, conveying and loadout. The mill feed storage, handling and loadout is controlled by five (5) baghouses, identified as CD32, CD33, CD34, CD35, and CD36, and exhausting to stacks S32, S33, S34, S35 and S36, respectively.

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

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

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

- (a) Two (2) natural gas-fired combustion sources, with heat input less than ten million Btu per hour, which were removed from the source in October, 2003.
- (b) A gasoline transfer and dispensing operation, handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage tank of less than 10,500 gallons, which was removed from the source in October, 2003.

### **Insignificant Activities**

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour (326 IAC 6-2-4), consisting of:
  - (1) Boiler #1, with a maximum heat input capacity of 5.0 MMBtu/hr,
  - (2) Boiler #2, with a maximum heat input capacity of 5.0 MMBtu/hr,
  - (3) Boiler #3, with a maximum heat input capacity of 3.3 MMBtu/hr.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank of less than 10,500 gallon capacity, and dispensing less than 230,000 gallons per month:

- (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Degreasing operations that do not exceed 145 gallons per 12 months (326 IAC 8-3-2) (326 IAC 8-3-5);
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other filtration equipment;
- (f) Paved and unpaved roads and parking lots with public access (326 IAC 6-4);
- (g) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower; and
- (h) A laboratory as defined in 326 IAC 2-7-1(21)(D).

**Existing Approvals**

Since the issuance of the Federally Enforceable State Operating Permit Renewal (F097-14650-00016) on July 21, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) First Administrative Amendment No. 097-17744-00016, issued on August 1, 2003.

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.

**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 <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 <sup>th</sup> 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 <sub>3</sub>	Attainment effective October 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	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.
<sup>1</sup> 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 effective April 5, 2005 for PM2.5.	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) 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. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.

(c) Other Criteria Pollutants

Marion County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	14,956
PM-10	7,327
SO <sub>2</sub>	0.03
VOC	0.80
CO	4.89
NO <sub>x</sub>	5.83

HAPs	tons/year
Highest Individual	0.039 [hexane]
Total	0.11

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM-10 is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM and PM-10 emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued a FESOP.

**Potential to Emit After Issuance**

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Limited Potential To Emit (tons/year)								
Process/emission unit	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							highest individual	total
ES1 - Grain Receiving	6.80	6.80	-	-	-	-	-	-
ES2 - Grain Loadout	3.17	3.17	-	-	-	-	-	-
ES3 - Grain Storage and Handling	13.63	13.63	-	-	-	-	-	-
ES4 - Cleaning House	8.45	8.45	-	-	-	-	-	-
ES5 - Mill House	20.45	20.45	-	-	-	-	-	-
ES6 - Bulk Plant and Product Loadout	6.57	6.57	-	-	-	-	-	-
ES7 - Feed Storage, Handling, & Loadout	3.45	3.45	-	-	-	-	-	-
Fugitives								
F1- Grain Receiving	2.68	2.68	-	-	-	-	-	-
F2- Grain Loadout	9.05	9.05	-	-	-	-	-	-
F3- Bin Vents	5.41	5.41	-	-	-	-	-	-
F5- Feed Loadout	0.02	0.02	-	-	-	-	-	-
Insignificant Activities								
Boiler #1	0.04	0.04	0.01	0.12	1.84	2.19	0.039 (hexane)	0.041
Boiler #2	0.04	0.04	0.01	0.12	1.84	2.19	0.039 (hexane)	0.041
Boiler #3	0.03	0.03	0.01	0.08	1.21	1.45	0.026 (hexane)	0.027
Degreasing Operations	-	-	-	0.48	-	-	-	-
<b>Total Emissions</b>	<b>94.48</b>	<b>94.48</b>	<b>0.03</b>	<b>0.80</b>	<b>4.89</b>	<b>5.83</b>	<b>0.104 (hexane)</b>	<b>0.109</b>

- (a) This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).
- (b) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM / PM-10 is limited to less than 250 tons per year and the potential to emit all other attainment regulated pollutants are less 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the potential to emit PM / PM-10 is limited to less than 100 tons per year and the potential to emit all other nonattainment regulated pollutants are less 100 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the potential to emit particulate matter with a diameter less than ten (10) micrometers (PM10), which is regulated as a surrogate for PM2.5, is (limited to) less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source. This status has been verified by the OES inspector assigned to the source.

### Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) The flour mill and grain elevator began operation in 1992 and has a total grain storage capacity of 5,835,000 bushels. Therefore, the requirements of the New Source Performance Standards (NSPS) Standards of Performance for Grain Elevators (40 CFR Part 60 Subpart DD), which is incorporated by reference at 326 IAC 12, apply to the following operations located at this source: the grain receiving area; the grain loadout area; the grain storage and handling operations; and the cleaning house.

The grain receiving area, the grain loadout area, the grain storage and handling operations, and the cleaning house, are subject to the following portions of Subpart DD. Non-applicable portions of the NSPS will not be included in the permit.

- (1) 60.300
- (2) 60.301
- (3) 60.302
- (4) 60.303
- (5) 60.304

The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12, apply to the facilities described in this section, except when otherwise specified in 40 CFR 60 Subpart DD.

- (b) The storage tank at the petroleum fuel transfer and dispensing facility, and listed as an insignificant activity, is not subject to the New Source Performance Standard (NSPS) Standards of Performance for Volatile Organic Liquid Storage Vessels (40 CFR 60.110b), Subpart Kb, because it does not meet the applicability requirements of this regulation (capacity is less than 75 m<sup>3</sup> / 19,812 gallons). Therefore, this regulation will not be included in the permit.
- (c) The three (3) natural gas fired boilers are not subject to the New Source Performance Standards (NSPS) Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR Part 60, Subpart Dc) because although construction of each boiler commenced in 1994, which is after the applicability date of June 9, 1989, each boiler has a maximum heat input capacity that is less than 10 MMBtu/hr.

- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (e) The degreasing operations are not subject to 40 CFR Part 63.460, Subpart T (NESHAPs) (326 IAC 14 and 40 CFR Part 63) because the source does not operate a batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine utilizing halogenated solvents.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-1.1-5 (Air Quality Requirements)**

Marion County has been designated as nonattainment for PM<sub>2.5</sub>. According to an EPA guidance memo dated April 5, 2005, PM<sub>10</sub> is to be utilized as a surrogate for PM<sub>2.5</sub> until the EPA can promulgate the PM<sub>2.5</sub> implementation rule. PM<sub>10</sub> emissions, and therefore PM<sub>2.5</sub> emissions, from this source are less than one hundred (100) tons per twelve (12) consecutive month period. There have been no modifications to this source such that it is a major source of PM<sub>10</sub> emissions. Therefore, this source is not subject to nonattainment new source review requirements for PM<sub>2.5</sub> emissions.

#### **326 IAC 2-2 and 2-3 (PSD and Emission Offset)**

ADM Milling Company is not a major stationary source because no attainment regulated pollutant emissions are equal to or greater than two hundred fifty (250) tons per year and no attainment or nonattainment regulated pollutant emissions are equal to or greater than one hundred (100) tons per year. ADM Milling commenced construction in 1992, which is after the applicability date of August 7, 1977. However, this source is not one of the 28 listed source categories under 326 IAC 2-2 and 326 IAC 2-3, and the source was not previously subject to the requirements of 326 IAC 2-2 (PSD) or 326 IAC 2-3 (Emission Offsets). There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2 or 326 IAC 2-3. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset) are each not applicable to the source.

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

All of the facilities in operation at the source were constructed before July 27, 1997. Therefore, the requirements of 326 IAC 2.4-1 (Major Sources of Hazardous Air Pollutants) are not applicable to these facilities.

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

This source is located in Marion County, is not required to obtain a Part 70 permit, and does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, 326 IAC 2-6 does not apply.

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

The unrestricted potential to emit PM / PM-10 is greater than one hundred (100) tons per year. However, pursuant to the FESOP Renewal (F097-14650-00016) issued on July 21, 2003, the source will limit its PM / PM-10 emissions to below Part 70 thresholds as follows:

- (1) Emissions from the truck unloading / grain receiving operations, identified as emission unit ES1, shall be controlled by a baghouse, identified as Unit CD-1 with a design flow rate of 18,000 acfm. The emission rate shall not exceed 0.01 grains/dscf, which will limit PM / PM-10 emissions to 1.55 lbs/hr and 6.8 tons per year (see Appendix A, page 5).
- (2) The throughput of grain received shall be limited to 1,716,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit PM / PM-10 emissions to 2.68 tons per year (see Appendix A, page 5).
- (3) Emissions from the grain loadout / grain shipping operations, identified as emission unit ES2, shall be controlled by a baghouse, identified as Unit CD-2 with a design flow rate of

8,447 acfm. The emission rate shall not exceed 0.01 grains/dscf, which will limit PM / PM-10 emissions to 0.72 lb/hr and 3.17 tons per year (see Appendix A, page 5).

- (4) The throughput of grain shipped shall be limited to 1,560,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit PM / PM-10 emissions to 9.05 tons per year (see Appendix A, page 5).
- (5) Emissions from grain handling and storage, identified as emission unit ES3, shall be controlled by three (3) baghouses, as follows:

Baghouse ID	Flowrate (acfm)	PM / PM-10 Limit (grains/dscf)	PM / PM-10 Emissions	
			lb/hr	ton/yr
CD-3	12,100	0.01	1.04	4.54
CD-4	17,000	0.01	1.46	6.38
CD-5	7,200	0.01	0.62	2.70

- (6) Emissions from the cleaning house, identified as emission unit ES4, shall be controlled by seven (7) baghouses, as follows:

Baghouse ID	Flowrate (acfm)	PM / PM-10 Limit (grains/dscf)	PM / PM-10 Emissions	
			lb/hr	ton/yr
CD-6	5,625	0.005	0.24	1.06
CD-7	5,625	0.005	0.24	1.06
CD-8	7,500	0.005	0.32	1.41
CD-9	7,500	0.005	0.32	1.41
CD-10	7,500	0.005	0.32	1.41
CD-11	5,625	0.005	0.24	1.06
CD-12	5,625	0.005	0.24	1.06

- (7) Emissions from the mill house, identified as emission unit ES5, shall be controlled by twelve (12) baghouses, as follows:

Baghouse ID	Flowrate (acfm)	PM / PM-10 Limit (grains/dscf)	PM / PM-10 Emissions	
			lb/hr	ton/yr
CD-13	15,876	0.005	0.68	2.98
CD-14	4,536	0.005	0.19	0.85
CD-15	4,536	0.005	0.19	0.85
CD-16	13,608	0.005	0.58	2.55
CD-17	15,694	0.005	0.67	2.95
CD-18	12,604	0.005	0.54	2.37
CD-19	17,014	0.005	0.73	3.19
CD-20	4,253	0.005	0.18	0.80
CD-21	4,253	0.005	0.18	0.80
CD-22	4,253	0.005	0.18	0.80
CD-23	8,507	0.005	0.36	1.60
CD-24	3,864	0.005	0.17	0.73

- (8) Emissions from the bulk plant and product loadout, identified as emission unit ES6, shall be controlled by seven (7) baghouses, as follows:

Baghouse ID	Flowrate (acfm)	PM / PM-10 Limit (grains/dscf)	PM / PM-10 Emissions	
			lb/hr	ton/yr
CD-25	22,250	0.005	0.95	4.18
CD-26	600	0.005	0.026	0.11
CD-27	600	0.005	0.026	0.11
CD-28	9,100	0.005	0.39	1.71
CD-29	893	0.005	0.038	0.17
CD-30	893	0.005	0.038	0.17
CD-31	664	0.005	0.028	0.12

- (9) Emissions from the mill feed storage, handling and loadout, identified as emission unit ES7, shall be controlled by four (4) baghouses, as follows:

Baghouse ID	Flowrate (acfm)	PM / PM-10 Limit (grains/dscf)	PM / PM-10 Emissions	
			lb/hr	ton/yr
CD-32	1,600	0.01	0.14	0.60
CD-33	2,000	0.01	0.17	0.75
CD-34	5,200	0.01	0.45	1.95
CD-35	400	0.01	0.03	0.15

- (10) The throughput of feed shipped shall be limited to 249,600 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit PM / PM-10 emissions to 0.02 tons per year (see Appendix A, page 5).

Compliance with these limitations shall limit the PM / PM-10 emissions from the entire source to less than one hundred (100) tons per year. Therefore, 326 IAC 2-7 does not apply.

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

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in 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 Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 6-3 (Particulate emission limitations)**

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), the particulate matter (PM) emissions from the following processes shall be limited by the following equations:

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

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

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

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

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions Pursuant to 326 IAC 6-3-2 (lb/hr)	Controlled PM Emissions (lb/hr) *	326 IAC 6.5 more stringent?
ES1	750	73.9	1.55	Yes
ES2	900	76.2	0.72	Yes
ES3	750	73.9	0.62 - 1.46	Yes
ES4	45	43.6	0.24 - 0.32	Yes
ES5	45	43.6	0.17 - 0.68	Yes
ES6	32	40.5	0.03 - 0.95	Yes
ES7	120	53.1	0.03 - 0.45	Yes

\* The baghouses controlling these processes shall be in operation at all times the processes are in operation, in order to comply with this limit.

Pursuant to 6-3-1(c), this rule does not apply if a particulate matter limitation established in 326 IAC 6.5 is more stringent than the particulate limitations established in 326 IAC 6-3-2. The limitation of 0.03 grains/dscf established by 326 IAC 6.5-1-2(d) for this source is more stringent (see Appendix A, page 6). Therefore, the limitations established by this rule shall not apply.

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

Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

**326 IAC 6-5 (Fugitive Dust Emissions)**

Pursuant to 326 IAC 6-5-3, any source of fugitive particulate matter which has potential fugitive particulate matter emissions of twenty five (25) tons per year or more and is located in Center Township of Marion County, shall submit a fugitive particulate matter emissions control plan. Utilizing AP-42 emission factors, and to the extent quantifiable, calculated fugitive particulate matter emissions do not exceed twenty five (25) tons per year or more (see TSD page 5 of 5). Therefore, this source is not subject to the provisions of 326 IAC 6-5-3 (Fugitive Dust Emissions).

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**

(a) The grain storage and handling operations at this source; which includes Grain Receiving (identified as Emission Unit ES1), Grain Loadout (identified as Emission Unit ES2), Grain Storage and Handling (identified as Emission Unit ES3), and the Cleaning House (identified as Emission Unit ES4), are subject to the provisions of 326 IAC 6.5-1-2(d), as follows:

(1) For any grain storage elevator located at any grain processing source that has a permanent grain storage capacity of thirty-five thousand two hundred (35,200) cubic meters (one million (1,000,000) U.S. bushels) or more shall be limited to particulate matter emissions of no greater than seven-hundredths (0.07) g/dscm (three-hundredths (0.03) grain per dscf).

(2) All grain elevators subject to this article shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

(A) Housekeeping practices shall be conducted as follows:

(i) Areas to be swept and maintained shall include, at a minimum, the following:

(aa) General grounds, yard, and other open areas.

(bb) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.

(cc) Grain driers with respect to accumulated particulate matter.

(ii) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.

(iii) Dust from driveways, access roads, and other areas of travel shall be controlled.

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

- (B) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
    - (i) Malfunctions.
    - (ii) Breakdowns.
    - (iii) Improper adjustment.
    - (iv) Operating above the rated or designed capacity.
    - (v) Not following designed operating specifications.
    - (vi) Lack of good preventive maintenance care.
    - (vii) Lack of critical and proper spare replacement parts on hand.
    - (viii) 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 under 326 IAC 5-1.
- (b) The remainder of the operations at this source; which includes the Mill House (identified as Emission Unit ES5), Bulk Plant and Product Loadout (identified as Emission Unit ES6), and the Mill Feed Storage, Handling and Loadout (identified as Emission Unit ES7) are limited to 0.03 grains/dscf pursuant to 326 IAC 6.5 -1-2(a).

**326 IAC 20 (Hazardous Air Pollutants)**

This source is an area source for HAPs. Therefore this rule is not included in the permit for this source.

**State Rule Applicability – Individual Facilities**

**326 IAC 6-2-4 (Emission Limitation for facilities specified in 326 IAC 6-2-1(d))**

The three natural gas-fired combustion with heat input less than ten million Btu per hour (Boilers #1, #2 and #3) were constructed after September 21, 1983, and are fired by natural gas only, therefore, pursuant to 326 IAC 6-2-1(d), 326 IAC 6-2-4 applies. Pursuant to 326 IAC 6-2-4, particulate emissions shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

$$\begin{aligned} Q &= \text{Boiler \#1} + \text{Boiler \#2} + \text{Boiler \#3} \\ &= 5.0 \text{ MMBtu/hr} + 5.0 \text{ MMBtu/hr} + 3.3 \text{ MMBtu/hr} \\ &= 13.3 \text{ MMBtu/hr} \end{aligned}$$

Pursuant to 326 IAC 6-2-4, particulate matter from each of the boilers shall be limited to 0.54 pounds of particulate per million Btu.

**326 IAC 8-3-2 (Cold Cleaner Operation)**

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation) the owner or operator of a cold cleaning facility shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operating requirement;
- (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

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

Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility 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°C) (one hundred degrees Fahrenheit (100°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°C) (one hundred degrees Fahrenheit (100°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°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

- (B) A water cover when solvent used is insoluble in, and heavier than water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (6) The owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (A) Close the cover whenever articles are not being handled in the degreaser.
  - (B) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (C) 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, Monitoring and Testing Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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.

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
ES1 - Baghouse CD1	Visible Emission Notations	Daily	Normal Abnormal	Response Steps
	Baghouse Pressure Drop		1 to 8 inches	
ES2 - Baghouse CD2	Visible Emission Notations	Daily	Normal Abnormal	Response Steps
	Baghouse Pressure Drop		1 to 8 inches	
ES3 - Baghouses CD3 through CD5	Visible Emission Notations	Daily	Normal Abnormal	Response Steps
	Baghouse Pressure Drop		1 to 8 inches	
ES4 - Baghouses CD6 through CD12	Visible Emission Notations	Daily	Normal Abnormal	Response Steps
	Baghouse Pressure Drop		1 to 8 inches	

Control	Parameter	Frequency	Range	Excursions and Exceedances
ES5 - Baghouses CD13 through CD24	Visible Emission Notations	Daily	Normal Abnormal	Response Steps
	Baghouse Pressure Drop		1 to 8 inches	
ES6 - Baghouses CD25 through CD31	Visible Emission Notations	Daily	Normal Abnormal	Response Steps
	Baghouse Pressure Drop		1 to 8 inches	
ES7 - Baghouses CD32 through CD35	Visible Emission Notations	Daily	Normal Abnormal	Response Steps
	Baghouse Pressure Drop		1 to 8 inches	

These compliance monitoring requirements are necessary to ensure that the control devices (baghouses) are operating properly and the source is in compliance with 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County) and 326 IAC 2-8 (FESOP).

(b) The testing requirements applicable to this source are as follows:

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
ES1	Baghouse CD1	PM / PM-10	within 180 days	every 5 years
ES2	Baghouse CD2	PM / PM-10	within 180 days	every 5 years
ES3	Baghouses CD3 - CD5	PM / PM-10	within 180 days	every 5 years
ES7	Baghouses CD32 - CD35	PM / PM-10	within 180 days	every 5 years

This equipment was last tested in September, 1994, when the equipment was installed, to satisfy the initial testing requirements of the NSPS. These testing requirements are necessary to ensure that the source is in compliance with the limits established by the NSPS and to limit emissions such that 326 IAC 2-7 not apply.

### Recommendation

The staff recommends to the Administrator that the Federally Enforceable State 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 September 27, 2007.

### Conclusion

The operation of this grain elevator and flour and milled wheat process shall be subject to the conditions of the attached Federally Enforceable State Operating Permit Renewal No. F097-25351-00016.

**Appendix A: Emissions Calculations  
Summary**

**Company Name:** ADM Milling Company  
**Address City IN Zip:** 854 Bethel Avenue, Beech Grove, Indiana, 46107  
**Permit Number:** F097-25351-00016  
**Plt ID:** 097-00016  
**Reviewer:** Jeffrey Hege  
**Date:** 12/10/2007

Process Name	Uncontrolled Potential Emissions (tons per year)							
	PM	PM10	SO2	NOx	VOC	CO	Individual HAP	Combined HAPs
ES-1 Grain Receiving	591.3	193.8						
ES-2 Grain Loadout	339	114.3						
ES-3 Grain Storage	200.4	111.7						
ES-4 Cleaning House	14.8	3.7						
ES-5 Mill House	13,797.00	6,898.50						
ES-6 Product Loadout	12.10	4.10						
ES-7 Feed Loadout	1.70	0.40						
<b>Insignificant Activities</b>								
Boiler #1 (5 MMBtu/hr)	0.04	0.17	0.01	2.19	0.12	1.84	0.039 [hexane]	0.041
Boiler #2 (5 MMBtu/hr)	0.04	0.17	0.01	2.19	0.12	1.84	0.039 [hexane]	0.041
Boiler #3 (3.3 MMBtu/hr)	0.03	0.11	0.01	1.45	0.08	1.21	0.026 [hexane]	0.027
degreaser					0.48			
<b>TOTAL</b>	14956.41	7326.94	0.03	5.83	0.80	4.89	0.039 [hexane]	0.11

Process Name	Controlled Potential Emissions (tons per year)							
	PM	PM10	SO2	NOx	VOC	CO	Individual HAP	Combined HAPs
ES-1 Grain Receiving	6.8	6.8						
ES-2 Grain Loadout	3.17	3.17						
ES-3 Grain Storage	13.63	13.63						
ES-4 Cleaning House	8.45	8.45						
ES-5 Mill House	20.46	20.46						
ES-6 Product Loadout	6.57	6.57						
ES-7 Feed Loadout	3.45	3.45						
Fugitives	17.16	17.16						
<b>Insignificant Activities</b>								
Boiler #1 (5 MMBtu/hr)	0.04	0.04	0.01	2.19	0.12	1.84	0.039 [hexane]	0.041
Boiler #2 (5 MMBtu/hr)	0.04	0.04	0.01	2.19	0.12	1.84	0.039 [hexane]	0.041
Boiler #3 (3.3 MMBtu/hr)	0.03	0.03	0.01	1.45	0.08	1.21	0.026 [hexane]	0.027
degreaser					0.48			
<b>TOTAL</b>	94.48	94.48	0.03	5.83	0.80	4.89	0.039 [hexane]	0.11

**Appendix A: Emissions Calculations  
PM & PM-10 Emissions  
Unlimited PTE**

**Company Name:** ADM Milling Company  
**Address City IN Zip:** 854 Bethel Avenue, Beech Grove, Indiana, 46107  
**Permit Number:** F097-25351-00016  
**Pit ID:** 097-00016  
**Reviewer:** Jeffrey Hege  
**Date:** 12/10/2007

Unit ID	Process Description	throughput (tons/hr)	PM emission factor	PM-10 emission factor	PM Emissions (tons/yr)	PM-10 Emissions (tons/yr)
ES-1	Grain Receiving	750	0.18	0.059	591.3	193.8
ES-2	Grain Loadout	900	0.086	0.029	339.0	114.3
ES-3	Grain Storage & Handling [Total Storage = 5,835,000 bushels]	750	0.061	0.034	200.4	111.7
ES-4	Cleaning House	45	0.075	0.019	14.8	3.7
ES-5	Mill House	45	70	35	13797.0	6898.5
ES-6	Bulk Plant & Product Loadout	32	0.086	0.029	12.1	4.1
ES-7	Mill feed storage, handling and loadout	120	0.0033	0.0008	1.7	0.4
<b>TOTALS</b>					<b>14,956</b>	<b>7,326.55</b>

**Methodology**

Emission Factors are from AP 42, Chapter 9.9.1

PM / PM-10 Emission (tons/yr) = Throughput (tons/hr) x Emission Factor (lb/ton) \* 8760 hr/yr / 2000 lb/ton

**Attachment A: Emissions Calculations**  
**Natural Gas Boilers #1 and #2**  
**MM BTU/HR <100**

**Company Name:** ADM Milling Company  
**Address City IN Zip:** 854 Bethel Avenue, Beech Grove, Indiana, 46107  
**Permit Number:** F097-25351-00016  
**Reviewer:** Jeffrey Hege  
**Date:** 12/10/2007

Heat Input Capacity                      Potential Throughput  
MMBtu/hr                                      MMCF/yr

5.0

43.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr (each unit)	0.042	0.166	0.013	2.190	0.120	1.840

\*PM emission factor is filterable PM only. 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/1,000 MMBtu

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

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr (each unit)	0.00005	0.00003	0.00164	0.03942	0.00007

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr (each unit)	0.00001	0.00002	0.00003	0.00001	0.00005

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

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

Natural Gas Boiler #3

MM BTU/HR <100

**Company Name:** ADM Milling Company  
**Address City IN Zip:** 854 Bethel Avenue, Beech Grove, Indiana, 46107  
**Permit Number:** F097-25351-00016  
**Reviewer:** Jeffrey Hege  
**Date:** 12/10/2007

Heat Input Capacity                      Potential Throughput  
 MMBtu/hr                                      MMCF/yr

3.3

28.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr (each unit)	0.027	0.110	0.009	1.445	0.079	1.214

\*PM emission factor is filterable PM only. 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/1,000 MMBtu

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

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr (each unit)	0.00003	0.00002	0.00108	0.02602	0.00005

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr (each unit)	0.00001	0.00002	0.00002	0.00001	0.00003

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  
Limited PM-10 Emmissions**

**Company Name:** ADM Milling Company  
**Address City IN Zip:** 854 Bethel Avenue, Beech Grove, Indiana, 46107  
**Permit Number:** F097-25351-00016  
**Pit ID:** 097-00016  
**Reviewer:** Jeffrey Hege  
**Date:** 12/10/2007

Point Source Emissions							
Emitting Unit	Control Device ID	Concentration	Flow Rate	Operating Hours	PM / PM-10 Emissions		PM / PM-10 Emissions per Emitting Unit (tons/yr)
		gr/dscf	dscfm	hr/yr	lbs/hr	tons/yr	
ES1 - Grain Recieving (truck)	CD1	0.01	18100	8760	1.55	6.80	6.80
ES2 - Grain Loadout	CD2	0.01	8447	8760	0.72	3.17	3.17
ES3 - Grain Storage and handling	CD3	0.01	12100	8760	1.04	4.54	13.63
	CD4	0.01	17000	8760	1.46	6.38	
	CD5	0.01	7200	8760	0.62	2.70	
	CD6	0.005	5625	8760	0.24	1.06	
ES4 - Cleaning House	CD7	0.005	5625	8760	0.24	1.06	8.45
	CD8	0.005	7500	8760	0.32	1.41	
	CD9	0.005	7500	8760	0.32	1.41	
	CD10	0.005	7500	8760	0.32	1.41	
	CD11	0.005	5625	8760	0.24	1.06	
	CD12	0.005	5625	8760	0.24	1.06	
	CD13	0.005	15876	8760	0.68	2.98	
ES5 - Mill House	CD14	0.005	4536	8760	0.19	0.85	20.46
	CD15	0.005	4536	8760	0.19	0.85	
	CD16	0.005	13608	8760	0.58	2.55	
	CD17	0.005	15694	8760	0.67	2.95	
	CD18	0.005	12604	8760	0.54	2.37	
	CD19	0.005	17014	8760	0.73	3.19	
	CD20	0.005	4253	8760	0.18	0.80	
	CD21	0.005	4253	8760	0.18	0.80	
	CD22	0.005	4253	8760	0.18	0.80	
	CD23	0.005	8507	8760	0.36	1.60	
	CD24	0.005	3864	8760	0.17	0.73	
	CD25	0.005	22250	8760	0.95	4.18	
ES6 - Bulk Plant and Product Loadout	CD26	0.005	600	8760	0.026	0.11	6.57
	CD27	0.005	600	8760	0.026	0.11	
	CD28	0.005	9100	8760	0.39	1.71	
	CD29	0.005	893	8760	0.038	0.17	
	CD30	0.005	893	8760	0.038	0.17	
	CD31	0.005	664	8760	0.028	0.12	
ES7 - Feed Storage, Handling, and Loadout	CD32	0.01	1600	8760	0.14	0.60	3.45
	CD33	0.01	2000	8760	0.17	0.75	
	CD34	0.01	5200	8760	0.45	1.95	
	CD35	0.01	400	8760	0.03	0.15	

Fugitive Emissions						
Emission Unit ID	Emissions Unit Description	Control Device	Control Efficiency	Throughput Cap tons/yr	Emissions Factor <sup>(b)</sup> lbs/ton	PM Emissions tons/yr
ES1 (Fug1)	Railcar Grain Recieving	3-sided enclosure	60.00%	1716000	0.0078	2.68
ES2 (Fug2)	Truck Grain Loadout	3-sided enclosure	60.00%	1560000	0.029	9.05
ES3 (Fug3)	Elevator Bin Vents	none	0.00%	1716000	0.0063	5.41
ES7 (Fug5)	Feed Loadout Fugitives	3-sided enclosure <sup>(a)</sup>	96.00%	249600	0.004	0.02
<b>Total</b>						<b>17.15</b>

**Methodology**

<sup>(a)</sup> 90% of emissions are captured by aspiration; 60% of uncaptured emissions are controlled by a three sided enclosure.

<sup>(b)</sup> Emissions Factors are from AP-42, a dustiness ratio of 2.5

PM / PM-10 Emission (lb/hr) = concentration (gr/dscf) x Flowrate (dscfm) \* 7000 gr/lb \* 60 min/hr

PM / PM-10 Emission (tons/yr) = Emissions (lb/hr) x Hours of Operation (hrs/yr) / 2000 lb/ton

Fugitive Emissions (tons/yr) = Emission Factor (lb/ton) \* Throughput (ton/hr) \* (1 - control efficiency) / 2000 lb/ton

**Total Source Limited Potential to Emit Summary**

Emissions Unit ID	Point Source Emissions tons/yr	Fugitive Emissions tons/yr
ES1	6.80 <sup>(a)</sup>	2.68 <sup>(b)</sup>
ES2	3.17	9.05 <sup>(b)</sup>
ES3	13.63	5.41
ES4	8.45	0.00
ES5	20.46	0.00
ES6	6.57	0.00
ES7	3.45	0.02
<b>Total Emissions</b>		<b>94.37</b>

<sup>(a)</sup> assume worst case all grain is recieved by railcar

<sup>(b)</sup> assume worst case all gain loadout is by truck

**Appendix A: Emissions Calculations  
PM / PM-10 Emmissions**

**Company Name:** ADM Milling Company  
**Address City IN Zip:** 854 Bethel Avenue, Beech Grove, Indiana, 46107  
**Permit Number:** F097-25351-00016  
**Plt ID:** 097-00016  
**Reviewer:** Jeffrey Hege  
**Date:** 12/10/2007

Point Source Emissions							
Emitting Unit	Control Device ID	Concentration	Flow Rate	PM / PM-10 Emissions (6.5-1)	PM /PM-10 Emissions by Emissions Unit	Throughput	PM Limitation (6-3-2) (Process Weight-Rate Rule)
		gr/dscf	dscfm	lbs/hr	lbs/hr	tons/hr	lbs/hr
ES1 - Grain Recieving (truck)	CD1	0.03	18100	4.65	4.65	750	73.93
ES2 - Grain Loadout	CD2	0.03	8447	2.17	2.17	900	76.23
ES3 - Grain Storage and handling	CD3	0.03	12100	3.11	9.33	750	73.93
	CD4	0.03	17000	4.37			
	CD5	0.03	7200	1.85			
ES4 - Cleaning House	CD6	0.03	5625	1.45	11.57	45	43.60
	CD7	0.03	5625	1.45			
	CD8	0.03	7500	1.93			
	CD9	0.03	7500	1.93			
	CD10	0.03	7500	1.93			
	CD11	0.03	5625	1.45			
ES5 - Mill House	CD12	0.03	5625	1.45	28.03	45	43.60
	CD13	0.03	15876	4.08			
	CD14	0.03	4536	1.17			
	CD15	0.03	4536	1.17			
	CD16	0.03	13608	3.50			
	CD17	0.03	15694	4.04			
	CD18	0.03	12604	3.24			
	CD19	0.03	17014	4.38			
	CD20	0.03	4253	1.09			
	CD21	0.03	4253	1.09			
	CD22	0.03	4253	1.09			
	CD23	0.03	8507	2.19			
ES6 - Bulk Plant and Product Loadout	CD24	0.03	3864	0.99	9.00	32	40.52
	CD25	0.03	22250	5.72			
	CD26	0.03	600	0.154			
	CD27	0.03	600	0.154			
	CD28	0.03	9100	2.34			
	CD29	0.03	893	0.230			
ES7 - Feed Storage, Handling, and Loadout	CD30	0.03	893	0.230	2.37	120	53.13
	CD31	0.03	664	0.171			
	CD32	0.03	1600	0.41			
	CD33	0.03	2000	0.51			
	CD34	0.03	5200	1.34			
	CD35	0.03	400	0.10			