



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 4, 2008

RE: Monsanto Global Seed / 159-25423-00010

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted 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, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot12/03/07



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**Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY**

**Monsanto Global Seed Company
908 North Independence
Windfall, Indiana 46076**

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M 159-25423-00010	
Issued by: Original Signed By:	Issuance Date: June 4, 2008
Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date: June 4, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary soybean seed processing plant.

Source Address:	908 North Independence, Windfall, IN 46076
Mailing Address:	908 North Independence, Windfall, IN 46076
General Source Phone Number:	317-903-6747
SIC Code:	0723
County Location:	Tipton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) soybean receiving pit (identified as 1E), constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using baghouse 9A as control and exhausting to stack 9A and inside the building.
- (b) Two (2) cleaners (identified as 3E), constructed prior to 1978, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using a baghouse (identified as 9A) as control, and exhausting to stack 9A and inside the building.
- (c) Two (2) color sorters, identified as 9EA and 9EB, constructed in 2006, each with a maximum capacity of 15 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (d) One (1) color sorter, identified as 9EC, constructed in 2006, with a maximum capacity of 7.5 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (e) Three (3) gravity tables (identified as 5E, 6E and 7E), constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones (identified as 5A, 6A, 7A) as control, and exhausting to stack 5A, 6A and 7A.
- (f) Two (2) aspirators (identified as 2E), constructed prior to 1978, with a maximum combined aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.

- (g) One (1) baghouse (identified as baghouse 8A), constructed September 20, 2000, venting otherwise fugitive emissions from storage bins, scales, conveyors, mini bulk bagging system, bulk bagging system, and bag filters located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.
- (h) Four (4) storage bins, each with a maximum grain storage capacity of one thousand (1,000) bushels, controlled by one (1) baghouse with a control efficiency of 99% and a maximum gas flow rate of five hundred (500) actual cubic feet per minute (acfm).
- (i) Fugitive emissions from paved/unpaved roads and lots.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M 159-25423-00010, 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, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Certification

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M 159-25423-00010 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

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

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

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

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.14 Response to Excursions or Exceedances

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

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

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

C.16 Malfunctions Report [326 IAC 1-6-2]

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

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

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) soybean receiving pit (identified as 1E), constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using baghouse 9A as control and exhausting to stack 9A and inside the building.
- (b) Two (2) cleaners (identified as 3E), constructed prior to 1978, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using a baghouse (identified as 9A) as control, and exhausting to stack 9A and inside the building.
- (c) Two (2) color sorters, identified as 9EA and 9EB, constructed in 2006, each with a maximum capacity of 15 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (d) One (1) color sorter, identified as 9EC, constructed in 2006, with a maximum capacity of 7.5 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (e) Three (3) gravity tables (identified as 5E, 6E and 7E), constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones (identified as 5A, 6A, 7A) as control, and exhausting to stack 5A, 6A and 7A.
- (f) Two (2) aspirators (identified as 2E), constructed prior to 1978, with a maximum combined aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (g) One (1) baghouse (identified as baghouse 8A), constructed September 20, 2000, venting otherwise fugitive emissions from storage bins, scales, conveyors, mini bulk bagging system, bulk bagging system, and bag filters located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.
- (h) Four (4) storage bins, each with a maximum grain storage capacity of one thousand (1,000) bushels, controlled by one (1) baghouse with a control efficiency of 99% and a maximum gas flow rate of five hundred (500) actual cubic feet per minute (acfm).

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3]

Pursuant to 326 IAC 6-3, particulate emissions from the soybean receiving pit shall not exceed 50.23 pounds per hour when operating at a process weight of 90 tons per hour.

D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3]

Pursuant to 326 IAC 6-3, particulate emissions from the soybean cleaners, color sorters, gravity tables, packaging, aspirators, and storage bins shall not exceed the pound per hour limit provided in the table below.

Facility	Process Weight (tons/hr)	Particulate Emission Limit (lbs/hr)
Cleaners (2) (per cleaner)	15	25.16
Each of Color Sorters 9EA and 9EB	15	25.16
Color Sorter 9EC	7.5	15.82
Gravity Tables (3) (per gravity table)	10	19.18
Packaging	30	40.04
Aspirators	30	40.04
Storage Bins	30	40.04

D.1.3 Preventive Maintenance Plans [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.4 Particulate Emission Limitations, Work Practices, and Control Technologies [326 IAC 6-3-2]

- (a) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the cyclones and baghouses for particulate control shall be in operation and control emissions from the soybean seed processing facilities at all times 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 the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the soybean seed processing facilities stack exhausts from stacks 5A, 6A and 7A shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the stack exhaust from stack 9A shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) 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.
- (d) 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.

- (e) 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.
- (f) 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 violation of this permit.

D.1.6 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across baghouse 9A used in conjunction with the soybean cleaners, at least once per day when the soybean cleaners are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 6.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of baghouse 9A controlling the soybean cleaners. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.8 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the process. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.9 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission units. 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).
- (c) Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.1.10 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.11 Record Keeping Requirement

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the soybean seed stack exhausts.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the pressure drop for baghouse 9A during normal operation.
- (c) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.8 and D.1.9 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Monsanto Global Seed Company
Address:	908 North Independence
City:	Windfall, Indiana 46076
Phone #:	317-903-6747
MSOP #:	M 159-25423-00010

I hereby certify that Monsanto Global Seed Company is : still in operation.
 no longer in operation.
I hereby certify that Monsanto Global Seed Company is : in compliance with the requirements of MSOP M 159-25423-00010.
 not in compliance with the requirements of MSOP M 159-25423-00010.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Monsanto Global Seed Company
Source Location:	908 North Independence, Windfall, IN 46076
County:	Tipton
SIC Code:	0723
Permit Renewal No.:	159-25423-00010
Permit Reviewer:	Christine L. Filutze

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Monsanto Global Seed Company relating to the operation of a soybean seed processing plant.

History

On October 18, 2007, Monsanto Global Seed Company submitted an application to the OAQ requesting to renew its operating permit (MSOP 159-15902-00010) which was issued on February 28, 2003.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) soybean receiving pit (identified as 1E), constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using baghouse 9A as control and exhausting to stack 9A and inside the building.
- (b) Two (2) cleaners (identified as 3E), constructed prior to 1978, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using a baghouse (identified as 9A) as control, and exhausting to stack 9A and inside the building.
- (c) Two (2) color sorters, identified as 9EA and 9EB, constructed in 2006, each with a maximum capacity of 15 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (d) One (1) color sorter, identified as 9EC, constructed in 2006, with a maximum capacity of 7.5 tons of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (e) Three (3) gravity tables (identified as 5E, 6E and 7E), constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones (identified as 5A, 6A, 7A) as control, and exhausting to stack 5A, 6A and 7A.
- (f) Two (2) aspirators (identified as 2E), constructed prior to 1978, with a maximum combined aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 9A as control, and exhausting to stack 9A and inside the building.
- (g) One (1) baghouse (identified as baghouse 8A), constructed September 20, 2000, venting otherwise fugitive emissions from storage bins, scales, conveyors, mini bulk bagging

system, bulk bagging system, and bag filters located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.

- (h) Four (4) storage bins, each with a maximum grain storage capacity of one thousand (1,000) bushels, controlled by one (1) baghouse with a control efficiency of 99% and a maximum gas flow rate of five hundred (500) actual cubic feet per minute (acfm).
- (i) Fugitive emissions from paved/unpaved roads and lots.

Existing Approvals

Since the issuance of the MSOP 159-25423-00010 on February 28, 2003, the source has constructed or has been operating under the following approvals as well:

Notice-Only Change No. 159-21175-00010, issued on May 24, 2005.

Minor Permit Revision No. 159-22713-00010, issued on April 19, 2006.

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 (MSOP No. 159-25423-00010).

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1-9).

County Attainment Status

The source is located in Tipton County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

(Air Pollution Control Board; 326 IAC 1-4-81; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA)

- (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) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Tipton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM 2.5**
Tipton County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions.
- (c) **Other Criteria Pollutants**
Tipton County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	237.99
PM ₁₀	69.01
SO ₂	-
VOC	-
CO	-
NO _x	-

Note: "-" pollutant not emitted by the facility.

Page one (1) of Appendix A of this TSD provides a summary of the unrestricted potential emissions of the source.

There are no significant emissions of Hazardous Air Pollutants (HAP).

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP.
- (b) 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.

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Soybean Receiving Pit	1.38	.31	-	-	-	-	-
Internal Handling	.80	.45	-	-	-	-	-
Cleaners	.99	negligible	-	-	-	-	-
Gravity Tables	9.86	.23	-	-	-	-	-
Color Sorters*	.10	negligible	-	-	-	-	-
Soybean Packaging	1.84	1.84	-	-	-	-	-
Aspirator	negligible	negligible	-	-	-	-	-
Storage Bins	negligible	negligible	-	-	-	-	-
Total Emissions	15.04	2.96	-	-	-	-	-

Notes: "-" pollutant not emitted by the facility.

"Negligible" is entered into the table for PM or PM₁₀ that are less than 0.10. The total emissions include the actual numbers.

* These units are controlled by baghouse 9A, which is required to meet the limits to avoid the requirements of 326 IAC 2-2 (PSD).

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) This soybean seed processing plant does not have a grain terminal elevator with a permanent storage capacity greater than 1.0 million bushels. Therefore, the requirements of the New Source Performance Standards for Grain Elevators (326 IAC 12, 40 CFR 60.300-304, Subpart DD) are not applicable to this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 20; and 40 CFR Parts 61 and 63) applicable to this source.

State Rule Applicability - Entire Source

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

The source was constructed in the 1950's and is not 1 of the 28 source categories. The source was modified in the early 1990's to add a soybean processing facility. After this modification, the

PM and PM₁₀ PTE were greater than 250 tons per year. However, this was not identified during the preparation of the construction permit (F159-11180-00010). The source uses, and has always used, control devices (including cyclones and baghouses) which have resulted in actual PM emissions that are much lower than the 250 tons per year PSD threshold. Because the actual PM and PM₁₀ emissions have always been less than 250 tons per year, a PSD permit for past constructions were deemed not necessary (see MSOP 159-15902-00010).

On December 11, 2000 the source informed IDEM, OAQ of the removal of the corn dryer and corn sheller from the plant. After the removal of these units, the source's PM PTE before controls remained above 250 tons per year (F159-12858-00010).

On July 18, 2002, the source requested a change in permit status from a FESOP (159-11180-00010) to a MSOP (159-15902-00010) due to the removal of all corn operations from the site resulted in the PTE of PM₁₀ to be less than 100 tons per year.

On February 27, 2006, IDEM, OAQ received a request from Monsanto for a minor permit revision (M159-22713-00010) due to the replacement of eight (8) spirals with three (3) color sorters. As a result of this replacement of equipment, the source's PM/PM₁₀ PTE before controls decreased below 250 tons per year and the source's PM/PM₁₀ PTE after controls was less than twenty-five (25) tons per year. Given these two factors, the previous PSD PM/PM₁₀ limits were not required for the source to remain a PSD minor source.

In addition, for this MSOP renewal (159-25423-00010), the PM PTE before controls remains below the 250 tons per year threshold, the PTE for PM₁₀ before controls continues to remain below the 250 tons per year threshold, and the PM and PM₁₀ PTE after controls remain below the 250 tons per year thresholds. Therefore, the entire source is a PSD minor source and the requirements of 326 IAC 2-2 (PSD) are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Tipton County and the potential to emit carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NO_x), particulate matter (PM₁₀), or sulfur dioxide (SO₂) into the ambient air is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

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

State Rule Applicability – Individual Facilities

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

The operation of soybean seed processing will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

The allowable particulate emission rate from the soybean operation plant shall not exceed the particulate emission limit in pounds per hour as shown in table below.

Facility	Process Weight		Particulate Emission Limit (lbs./hr)
	(lbs/hr)	(tons/hr)	
Soybean receiving pit	180,000	90	50.23
Cleaners (2)	30,000 per cleaner	15	25.16 per cleaner
Color Sorters 9EA and 9EB	30,000 per sorter	15	25.16 per sorter
Color Sorter 9EC	15,000	7.5	15.82
Gravity Tables (3)	20,000 per gravity table	10	19.18 per gravity table
Packaging	60,000	30	40.04
Aspirator	60,000	30	40.04

The pounds per hour limitations were calculated with the following equations:

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

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

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

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

The cyclone and baghouse shall be in operation at all times the soybean seed processing facilities are in operation, in order to comply with this limit.

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

Permits issued under 326 IAC 2-6.1 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 IAC2-6.1. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

Visible Emissions Notations

- (a) Visible emission notations of the soybean seed processing facilities stack exhausts from stacks 5A, 6A and 7A shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (b) Visible emission notations of the stack exhaust from stack 9A shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) 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 violation of this permit.

Recommendation

The staff recommends to the Commissioner that the MSOP 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 October 18, 2007.

Conclusion

The operation of this soybean seed processing plant shall be subject to the conditions of the attached MSOP Renewal No. 159-25423-00010.

**Appendix A: Emission Calculations
Summary Calculations**

Company Name: Monsanto Global Seed Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Reviewer: Christine L. Filutze
Date: February 29, 2008

SUMMARY EMISSIONS BEFORE CONTROL IN TPY (tons per year)

UNITS	PM	PM10	PM lbs/hour
soyabean receiving pit	13.8	3.07	3.15
internal handling	8.02	4.47	1.83
cleaners	98.55	24.64	22.50
gravity tables	98.55	24.64	22.50
color sorters	10.00	5.58	2.28
soyabean packaging	1.84	1.84	0.42
aspirator	3.94	3.94	0.90
storage bins	3.29	0.83	0.75
SUM	237.99	69.01	54.34

SUMMARY OF EMISSIONS AFTER CONTROL IN TPY (tons per year)*

UNITS	PM	PM10	PM lbs/hour
soyabean receiving pit	1.38	0.31	0.32
internal handling	0.80	0.45	0.18
cleaners	0.99	0.02	0.23
gravity tables	9.86	0.23	2.25
color sorters	0.10	0.06	0.02
soyabean packaging	1.84	1.84	0.42
aspirator	0.04	0.04	0.01
storage bins	0.03	0.01	0.01
SUM	15.04	2.96	3.43

* Assumes 90% - 99 % control

**Appendix A: Emission Calculations
Particulate from Soybean Receiving Pit**

Company Name: Monsanto Global Seed Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Reviewer: Christine L. Filutze
Date: February 29, 2008

	Receiving Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Cyclone Control Efficiency	PTE After Controls (tons/yr)
PM	90	0.035	13.8	90%	1.38
PM₁₀	90	0.0078	3.07	90%	0.307

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving by Hopper Truck, SCC 3-02-005-52). May 1998

** Assume all PM emissions are PM₁₀.

Methodology

PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr

**Appendix A: Emission Calculations
Particulate from Internal Handling**

Company Name: Monsanto Global Seed Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Reviewer: Christine L. Filutze
Date: February 29, 2008

	Handling Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Cyclone Control Efficiency	PTE After Controls (tons/yr)
PM	30	0.061	8.02	90%	0.802
PM₁₀	30	0.034	4.47	90%	0.447

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). May 1998

** Assume all PM emissions are PM₁₀.

Methodology

PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr

**Appendix A: Emission Calculations
Particulate from Cleaners**

Company Name: Monsanto Global Seed Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Reviewer: Christine L. Filutze
Date: February 29, 2008

	Cleaning Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Baghouse Control Efficiency***	PTE After Controls (tons/yr)
PM	30	0.075	98.55	99%	0.99
PM₁₀	30	0.075	24.64	99%	0.02

* Emission factors from AP-42, Table 9.9.1-1 (Grain Cleaning, Internal Vibrating, SCC 3-02-005-37). May 1998

**Before controls, PM₁₀ is 25 % of the filterable PM. From AP-42, Table 9.9.1-1 (Grain Cleaning, SSC 3-02-005-37)

Also, before controls emission factors were calculated assuming 90 % capture efficiency

***Assume all PM emissions are PM₁₀.

Methodology

PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr

**Appendix A: Emission Calculations
Particulate from Gravity Tables**

Company Name: Monsanto Global Seed Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Reviewer: Christine L. Filutze
Date: February 29, 2008

	Sorting Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Cyclone Control Efficiency***	PTE After Controls (tons/yr)
PM	30	0.075	98.55	90%	9.86
PM₁₀	30	0.075	24.64	90%	0.23

* Emission factors from AP-42, Table 9.9.1-1 (Grain Cleaning, Internal Vibrating SCC 3-02-005-037). May 1998

**Before controls, PM₁₀ is 25 % of the filterable PM. From AP-42, Table 9.9.1-1 (Grain Cleaning, SSC 3-02-005-37)

Also, before controls emission factors were calculated assuming 90 % capture efficiency

***Assume all PM emissions are PM₁₀.

Methodology

PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr

Appendix A: Emission Calculations
PM and PM10 Emissions
From the Three (3) Soybean Color Sorters (9E)

Company Name: Monsanto Global Seed Company
Address: 908 North Independence, Windfall, IN 46076
Permit No: 159-25423-00010
Reviewer: Christine L. Filutze
Date: February 29, 2008

1. Potential to Emit PM/PM10 Before Control:

Unit ID	Unit Description	Max. Throughput Rate (tons/hr/unit)	Number of Units	Uncontrolled PM Emission Factor (lbs/ton)	PTE of PM before Control (lbs/hr/unit)	PTE of PM before Control (tons/yr)	Uncontrolled PM10 Emission Factor (lbs/ton)	PTE of PM10 before Control (lbs/hr/unit)	PTE of PM10 before Control (tons/yr)
9EA and B	Color Sorters	15	2	0.061	0.92	8.02	0.034	0.51	4.47
9EC	Color Sorter	7.5	1	0.061	0.46	2.00	0.034	0.26	1.12
Total					1.37	10.0			5.58

Note: Emission factors are from AP-42, Chapter 9.9.1 - Grain Elevators, Table 9.9.1-1 (03/03) for grain handling operations.

Methodology

PTE before Control (lbs/hr/unit) = Max. Throughput Rate (tons/hr/unit) x Uncontrolled Emission Factor (lbs/ton)

PTE before Control (tons/yr) = Max. Throughput Rate (tons/hr/unit) x Uncontrolled Emission Factor (lbs/ton) x 8760 hr/yr x 1 ton/2000 lbs x Number of Units

2. Potential to Emit PM/PM10 After Control:

Unit ID	Unit Description	Number of Units	Control Efficiency* (%)	PTE of PM after Control (lbs/hr/unit)	PTE of PM after Control (tons/yr)	PTE of PM10 after Control (lbs/hr/unit)	PTE of PM10 after Control (tons/yr)
9EA and B	Color Sorters	2	99%	9.15E-03	0.08	5.10E-03	0.04
9EC	Color Sorter	1	99%	4.58E-03	0.02	2.55E-03	0.01
Total				0.023	0.10		0.06

* These units are controlled by baghouse 9A.

Methodology

PTE after Control (lbs/hr/unit) = PTE before Control (lbs/hr/unit) x (1 - Control Efficiency)

PTE after Control (tons/yr) = PTE before Control (lbs/hr/unit) x 8760 hr/yr x 1 ton/2000 lbs x (1 - Control Efficiency) x Number of Units

**Appendix A: Emission Calculations
Particulate from Packaging**

Company Name: Monsanto Global Seed Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Reviewer: Christine L. Filutze
Date: February 29, 2008

	Packaging Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)
PM	30	0.0014	1.84
PM₁₀	30	0.0014	1.84

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving by Hopper Truck, SCC 3-02-005-51). May 1998

**Before controls, emission factors were calculated assuming 90 % capture efficiency

Also, assume all PM emissions are PM₁₀.

Methodology

PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr

**Appendix A: Emission Calculations
Particulate from Aspirator**

Company Name: Monsanto Global Seed Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Reviewer: Christine L. Filutze
Date: February 29, 2008

	Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Cyclone Control*** Efficiency	PTE After Controls (tons/yr)
PM	30	0.003	3.94	90%	0.04
PM₁₀	30	0.003	3.94	90%	0.04

* Emission factors from AP-42, Table 9.9.1-1 (Rice Mills, Aspirator SCC 3-02-007-77). May 1998

**Before controls, emission factors were calculated assuming 90 % capture efficiency

*** Assume all PM emissions are PM₁₀.

Methodology

PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr

**Appendix A: Emission Calculations
Particulate from Storage Bins**

Company Name: Monsanto Global Seed Company
Address City IN Zip: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Reviewer: Christine L. Filutze
Date: February 29, 2008

Particulate Emissions

Pollutant	Maximum Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	30	0.025	3.29	99%	0.033
PM ₁₀	30	0.0063	0.83	99%	0.008

* Emission factors from AP-42, Table 9.9.1-1 (Storage bin (vent) (SCC 3-02-005-40)). March 2003

Methodology

PTE = Receiving capacity (tons/hr) * PM emission factor (lbs/hr) * 1 ton/2000 lbs * 8760 hr/yr

326 IAC 6-3-2 Compliance Calculations:

Process Weight (tons/hr)	Allowable Emission Rate (lbs/hr)	PTE of PM Before Controls (lb/hr)	PTE of PM After Controls (lb/hr)
30	40.04	0.75	0.008

Methodology

$E = (4.10 * P^{0.67})$ (For process weights equal to or less than 60,000 lbs/hr)

where: E = allowable emission rate in lbs/hr

P = process weight in tons/hr

emissions after controls is negligible. Therefore, the applicant will be in compliance with 326 IAC 6-3.