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: July 7, 2008

RE: Gavilon Grain / 153-25653-00039

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

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

New Source Construction and Minor Source Operating Permit
OFFICE OF AIR QUALITY

Gavilon Grain, LLC dba Peavey Company-Shelburn
7646 North 125 East
Shelburn, Indiana 47879

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 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.: M153-25653-00038	
Original signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 7, 2008 Expiration Date: July 7, 2013

TABLE OF CONTENTS

A. SOURCE SUMMARY 3
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]
A.2 Emission Units and Pollution Control Equipment Summary

B. GENERAL CONDITIONS 8
B.1 Definitions [326 IAC 2-1.1-1]
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]
B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]
B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
B.5 Term of Conditions [326 IAC 2-1.1-9.5]
B.6 Enforceability
B.7 Severability
B.8 Property Rights or Exclusive Privilege
B.9 Duty to Provide Information
B.10 Certification
B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]
B.12 Preventive Maintenance Plan [326 IAC 1-6-3]
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]
B.15 Permit Renewal [326 IAC 2-6.1-7]
B.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]
B.17 Source Modification Requirement
B.18 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]
B.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]
B.20 Annual Fee Payment [326 IAC 2-1.1-7]
B.21 Credible Evidence [326 IAC 1-1-6]

C. SOURCE OPERATION CONDITIONS 14

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]
C.2 Permit Revocation [326 IAC 2-1.1-9]
C.3 Opacity [326 IAC 5-1]
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
C.6 Fugitive Dust Emissions [326 IAC 6-4]
C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]
C.8 Stack Height [326 IAC 1-7]
C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-6.1-5(a)(2)]
C.10 Performance Testing [326 IAC 3-6]

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]
C.12 Compliance Monitoring [326 IAC 2-1.1-11]
C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
C.14 Instrument Specifications [326 IAC 2-1.1-11]

Corrective Actions and Response Steps
C.15 Response to Excursions or Exceedances
C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]
C.17 Malfunctions Report [326 IAC 1-6-2]
C.18 General Record Keeping Requirements [326 IAC 2-6.1-5]
C.19 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

D.1. EMISSIONS UNIT OPERATION CONDITIONS 21

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)] : Grain Processing And Storage
D.1.1 Particulate [326 IAC 6-3-2]
D.1.2 New Source Performance Standards - Grain Elevators [40 CFR 60, Subpart DD]
D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements
D.1.4 Particulate Control]

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]
D.1.5 Visible Emissions Notations
D.1.6 Monitoringl

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]
D.1.7 Record Keeping Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS 29

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

Annual Notification 31
Malfunction Report 33
Attachment A: Fugitive Particulates Control Plan 35
Affidavit of Construction 39

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 grain processing and storage facility.

Source Address:	7646 North 125 East, Shelburn, Indiana 47879
Mailing Address:	7646 North 125 East, Shelburn, Indiana 47879
General Source Phone Number:	812-397-5710
SIC Code:	5153
County Location:	Sullivan
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of the 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) enclosed grain receiving operation, identified as RECEIVING, constructed in 1972, and consisting of the following:

(1) One (1) truck dump pit, identified as Pit #1, with a maximum capacity of 15,000 bushels per hour (450 tons/hr), with emissions exhausted to the atmosphere. Mineral oil is applied to all grain upon receipt.

(2) One (1) truck dump pit, identified as Pit #2, with a maximum capacity of 8,000 bushels per hour (240 tons/hr), with emissions exhausted to the atmosphere. Mineral oil is applied to all grain upon receipt.

(3) One (1) truck dump pit, identified as Pit #3, with a maximum capacity of 6,000 bushels per hour (180 tons/hr), with emissions exhausted to the atmosphere. Mineral oil is applied to all grain upon receipt.

(b) One (1) column grain dryer, with a natural gas-fired, low emission cyclone burner, identified as DRYER1, constructed in 1998, with a plate perforation diameter of 0.07 inches, with a maximum heat input capacity of 41.96 MMBtu/hr and a maximum throughput rate of 4,700 bushels of grain per hour (140 tons/hr). The dryer is loaded by the Wet Leg (6) & emptied by the Dry Leg (7). Mineral oil is applied to all grain after it is processed in DRYER1.

(c) One (1) grain handling system, identified as HANDLING, constructed in 1972, with emissions exhausted to the atmosphere, and consisting of the following:

(1) One (1) enclosed receiving pit drag, identified as Pit 1 Drag, rated at 15,000 bushels per hour (450 tons/hr), constructed in 2001, empties Pit #1 and supplies Leg 1.

(2) One (1) enclosed receiving leg, identified as Leg 1, rated at 15,000 bushels per hour (450 tons/hr), constructed in 2001, and serving bins 5-10, drags 4, 8, and 14.

(3) One (1) enclosed receiving pit drag, identified as Pit 2 Drag, rated at 8,000 bushels per hour (240 tons/hr), constructed in 1972, empties Pit #2 and supplies Leg 2.

(4) One (1) enclosed receiving leg, identified as Leg 2, rated at 8,000 bushels per hour (240 tons/hr), constructed in 1972, and serving bins 5-10, drags 4, 8, and 14.

(5) One (1) enclosed receiving pit drag, identified as Pit 3 Drag, rated at 10,000 bushels per hour (280 tons/hr), constructed in 2007, empties Pit #3 and supplies Leg 3.

(6) One (1) enclosed receiving leg, identified as Leg 3, rated at 6,000 bushels per hour (180 tons/hr), constructed in 1972, and serving bins 3, 4, 13, 14, and 17, and drag 16.

(7) One (1) enclosed headhouse, identified as HH1, constructed in 1972, consisting of a feed Legs 1 & 2 (L1, L2), a distributor, and feeding onto drags 4 and 8, with a maximum throughput rate of 4,700 bushels of grain per hour (140 tons/hr), with emissions exhausted to the atmosphere.

(8) One (1) open belt conveyor, identified as BELT 2 (B2), constructed in 2006, rated as 20,000 bushels per hour (600 tons/hr), serving Belt 1.

(9) One (1) enclosed handling leg, identified as the WHITE Leg (L4), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving the scales, bins 8 & 9 and drag 14.

(10) One (1) enclosed handling leg, identified as the NORTH Leg (L5), constructed in 1972, rated at 4,000 bushels per hour (120 tons/hr), serving the loadout scales and drag 4.

(11) One (1) enclosed belt handling conveyor, identified as the 40,000 Belt (B1), constructed in 2006, rated at 40,000 bushels per hour (1200 tons/hr), serving the East PAD (XT9) ground pile.

(12) One (1) enclosed belt handling conveyor, identified as the BIG TANK Belt (B3), constructed in 1972, rated at 8,000 bushels per hour (240 tons/hr), serving the receiving pit drag 2.

(13) One (1) enclosed drag conveyor, identified as the B1 TOP drag (D4), constructed in 1972, rated at 8,000 bushels per hour (240 tons/hr), serving bin 10 and drag 5.

(14) One (1) enclosed drag conveyor, identified as the B2, B3 TOP drag (D5), constructed in 1972, rated at 8,000 bushels per hour (240 tons/hr), serving bins 11 and 12.

(15) One (1) enclosed drag conveyor, identified as the B1 BOTTOM drag (D6), constructed in 2003, rated at 20,000 bushels per hour (600 tons/hr), serving Leg 1.

(16) One (1) enclosed drag conveyor, identified as the B2, B3 BOTTOM drag (D7), constructed in 2003, rated at 20,000 bushels per hour (600 tons/hr), serving drag 6.

(17) One (1) enclosed drag conveyor, identified as the LOADOUT drag (D8), constructed in 2007, rated at 30,000 bushels per hour (900 tons/hr), serving bins 15 & 16..

(18) One (1) enclosed drag conveyor, identified as the BROCK drag (D9), constructed in 1972, rated at 10,000 bushels per hour (300 tons/hr), serving bin 18.

(19) One (1) enclosed drag conveyor, identified as the SW drag (D10), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving Leg 3.

(20) One (1) enclosed drag conveyor, identified as the NW drag (D11), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving Leg 3.

(21) One (1) enclosed drag conveyor, identified as the SE drag (D12), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving Leg 3.

(22) One (1) enclosed drag conveyor, identified as the NE drag (D13), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving Leg 3.

(23) One (1) enclosed auger system, constructed in 1972, with emissions exhausted to the atmosphere, and consisting of the following:

(1) One (1) enclosed auger, identified as B BIN auger (A1), with a maximum throughput rate of 4,000 bushels per hour (120 tons/hr), serving Legs 1 & 2.

(2) Two (2) enclosed augers, with a maximum throughput rate of 3,500 bushels per hour (105 ton/hr), identified as NW PAD auger (A2) and SW PAD auger (A3), which transfer grain to the outdoor temporary storage piles. The NW PAD auger serves the WEST PAD (XT2) and the SW PAD auger serves the WEST PAD (XT2).

(d) One (1) Storage system, identified as STORAGE, constructed in 1972, with emissions exhausted to the atmosphere, and consisting of the following:

(1) Four (4) metal storage tanks, identified as SE (T3), NE (T4), SW (T13), and NW (T14), constructed in 1987, with a combined storage capacity of 126,740 bushels (3802 tons) and a maximum unload capacity of 6,000 bushels per hour (180 tons/hr). Each of these four tanks are vented to the atmosphere, with each tank having four vents labeled a, b, c, and d, respectively. SE (T3) & NE (T4) have truck loadout spouts.

(2) Four (4) headhouse storage bins, identified as EAST (T6), NORTH (T7), WEST (T8), and SOUTH (T9), constructed in 1972, with a total storage capacity of 98,052 bushels, and with a total maximum throughput rate of 8,000 bushels per hour (240 tons/hr), vented to the atmosphere through vents 6a, 7a, 8a, & 9a, respectively. SOUTH (T8) is equipped with a truck loadout spout.

(3) One (1) metal storage tank, identified as the BIG TANK (T5), constructed in 1972, with storage capacity of 353,489 bushels (10,605 tons) and a maximum unload capacity of 8,000 bushels per hour (240 tons/hr), vented to the atmosphere through vent 5a & 5b. The BIG TANK (T5) has a truck loadout spout.

(4) One (1) metal storage tank, identified as BROCK (T18), constructed in 1987, with storage capacity of 273,198 bushels (8196 tons) and a maximum unload capacity of 10,000 bushels per hour (300 tons/hr), vented to the atmosphere through ten vents, identified as vents 18 a-j.

(5) Three (3) metal storage tanks, identified as DIRTY (T19), CLEAN YELLOW (20), and CLEAN WHITE (21), constructed in 1972, with a combined storage capacity of 6,193 bushels (186 tons) and a maximum unload capacity of 6,000 bushels per hour (180 tons/hr).

(6) Three (3) concrete silos, identified as B1 (S10), B2 (S11), B3 (S12) constructed in 1977, with a combined storage capacity of 303,464 bushels (9104 tons) and a maximum unload capacity of 15,000 bushels per hour (450 tons/hr), vented to the atmosphere through vents 10a & b, 11a & b, and 12a &b, respectively. Silos B1, B2, and B3 have truck

loadout spouts.

(7) One (1) temporary outdoor storage pile, on a concrete surface, covered by tarpaulin, identified as WEST PAD (XT2), with a capacity of 1,001,000 bushels of grain (30,030 tons), constructed in 1972, with dimensions of 145 feet x 500 feet.

(8) One (1) temporary outdoor storage pile, on a gravel surface, covered by tarpaulin, identified as EAST PAD (XT9), with a capacity of 1,666,000 bushels of grain (49,980 tons), constructed in 2006, with dimensions of 185 feet x 500 feet.

(e) One (1) grain loadout operation, identified as SHIPPING, constructed in 1972, with emissions exhausted to the atmosphere, consisting of the following:

(1) Two (2) railcar loadout bins, identified as 1RN and 1RS, with telescoping spouts, each with a maximum loadout capacity of 52,500 bushels per hour (1,575 tons/hr).

(2) One (1) truck loadout bin, identified as 3L, with a maximum loadout capacity of 8,000 bushels per hour (240 tons/hr).

(3) One (1) truck loadout bin, identified as 1L, with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(4) Eleven (11) side draw truck loadout spouts, each with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(5) Two (2) steel loadout tanks, identified as SOUTH LOADOUT Tank (T15) & NORTH LOADOUT Tank (T16), constructed in 1972, with a combined storage capacity of 9,310 bushels (279 tons) and a maximum loadout capacity of 52,500 bushels per hour (1,575 tons/hr), vented to the atmosphere through vents #15a & 16a, respectively.

(6) One (1) steel overhead loadout bin, identified as #3 OVERHEAD Tank (17), constructed in 1972, and a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr), equipped with a loadout spout, with a storage capacity of 1,989 bushels (60 tons).

Insignificant Activities

(f) Underground conveyors. [326 IAC 2-7-1(21)(G)(xiv)]

(g) Paved roads and parking lots with public access. [326 IAC 6-4]

(h) A gasoline fuel 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 capacity less than or equal to 10,500 gallons. Such storage tanks may be in a fixed location or on mobile equipment. [326 IAC 2-7-1(21)(G)(ii)]

(i) Pressurized storage tanks and associated piping for Acetylene. [326 IAC 2-7-1(40)(J)]

(j) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings. Mineral oil is applied to grain upon receipt and after drying. [326 IAC 2-7-1(21)(G)(vi)]

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 Revocation of Permits [326 IAC 2-1.1-9(5)]

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

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

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

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M153-25653-00038, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

B.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 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.10 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.11 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.12 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) All terms and conditions of permits established prior to M153-25653-00038 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 2-6.1-7(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.15 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.16 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.17 Source Modification Requirement

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

B.18 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.19 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.20 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.21 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 construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on 3/14/2008. The plan is included as Attachment A.

C.8 Stack Height [326 IAC 1-7]

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

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

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

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

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

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

(A) Asbestos removal or demolitions 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.10 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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.11 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

Corrective Actions and Response Steps

C.15 Response to Excursions or Exceedances

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

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

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

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

(1) monitoring results;

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

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

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

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

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

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

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

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations

or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

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

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]: Grain Processing And Storage

(a) One (1) enclosed grain receiving operation, identified as RECEIVING, constructed in 1972, and consisting of the following:

(1) One (1) truck dump pit, identified as Pit #1, with a maximum capacity of 15,000 bushels per hour (450 tons/hr), with emissions exhausted to the atmosphere. Mineral oil is applied to all grain upon receipt.

(2) One (1) truck dump pit, identified as Pit #2, with a maximum capacity of 8,000 bushels per hour (240 tons/hr), with emissions exhausted to the atmosphere. Mineral oil is applied to all grain upon receipt.

(3) One (1) truck dump pit, identified as Pit #3, with a maximum capacity of 6,000 bushels per hour (180 tons/hr), with emissions exhausted to the atmosphere. Mineral oil is applied to all grain upon receipt.

(b) One (1) column grain dryer, with a natural gas-fired, low emission cyclone burner, identified as DRYER1, constructed in 1998, with a plate perforation diameter of 0.07 inches, with a maximum heat input capacity of 41.96 MMBtu/hr and a maximum throughput rate of 4,700 bushels of grain per hour (140 tons/hr). The dryer is loaded by the Wet Leg (6) & emptied by the Dry Leg (7). Mineral oil is applied to all grain after it is processed in DRYER1.

(c) One (1) grain handling system, identified as HANDLING, constructed in 1972, with emissions exhausted to the atmosphere, and consisting of the following:

(1) One (1) enclosed receiving pit drag, identified as Pit 1 Drag, rated at 15,000 bushels per hour (450 tons/hr), constructed in 2001, empties Pit #1 and supplies Leg 1.

(2) One (1) enclosed receiving leg, identified as Leg 1, rated at 15,000 bushels per hour (450 tons/hr), constructed in 2001, and serving bins 5-10, drags 4, 8, and 14.

(3) One (1) enclosed receiving pit drag, identified as Pit 2 Drag, rated at 8,000 bushels per hour (240 tons/hr), constructed in 1972, empties Pit #2 and supplies Leg 2.

(4) One (1) enclosed receiving leg, identified as Leg 2, rated at 8,000 bushels per hour (240 tons/hr), constructed in 1972, and serving bins 5-10, drags 4, 8, and 14.

(5) One (1) enclosed receiving pit drag, identified as Pit 3 Drag, rated at 10,000 bushels per hour (280 tons/hr), constructed in 2007, empties Pit #3 and supplies Leg 3.

(6) One (1) enclosed receiving leg, identified as Leg 3, rated at 6,000 bushels per hour (180 tons/hr), constructed in 1972, and serving bins 3, 4, 13, 14, and 17, and drag 16.

(7) One (1) enclosed headhouse, identified as HH1, constructed in 1972, consisting of a feed Legs 1 & 2 (L1, L2), a distributor, and feeding onto drags 4 and 8, with a maximum throughput rate of 4,700 bushels of grain per hour (140 tons/hr), with emissions exhausted to the atmosphere.

(8) One (1) open belt conveyor, identified as BELT 2 (B2), constructed in 2006, rated as 20,000 bushels per hour (600 tons/hr), serving Belt 1.

(9) One (1) enclosed handling leg, identified as the WHITE Leg (L4), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving the scales, bins 8 & 9 and drag 14.

(10) One (1) enclosed handling leg, identified as the NORTH Leg (L5), constructed in 1972, rated at 4,000 bushels per hour (120 tons/hr), serving the loadout scales and drag 4.

(11) One (1) enclosed belt handling conveyor, identified as the 40,000 Belt (B1), constructed in 2006, rated at 40,000 bushels per hour (1200 tons/hr), serving the East PAD (XT9) ground pile.

(12) One (1) enclosed belt handling conveyor, identified as the BIG TANK Belt (B3), constructed in 1972, rated at 8,000 bushels per hour (240 tons/hr), serving the receiving pit drag 2.

(13) One (1) enclosed drag conveyor, identified as the B1 TOP drag (D4), constructed in 1972, rated at 8,000 bushels per hour (240 tons/hr), serving bin 10 and drag 5.

(14) One (1) enclosed drag conveyor, identified as the B2, B3 TOP drag (D5), constructed in 1972, rated at 8,000 bushels per hour (240 tons/hr), serving bins 11 and 12.

(15) One (1) enclosed drag conveyor, identified as the B1 BOTTOM drag (D6), constructed in 2003, rated at 20,000 bushels per hour (600 tons/hr), serving Leg 1.

(16) One (1) enclosed drag conveyor, identified as the B2, B3 BOTTOM drag (D7), constructed in 2003, rated at 20,000 bushels per hour (600 tons/hr), serving drag 6.

(17) One (1) enclosed drag conveyor, identified as the LOADOUT drag (D8), constructed in 2007, rated at 30,000 bushels per hour (900 tons/hr), serving bins 15 & 16..

(18) One (1) enclosed drag conveyor, identified as the BROCK drag (D9), constructed in 1972, rated at 10,000 bushels per hour (300 tons/hr), serving bin 18.

(19) One (1) enclosed drag conveyor, identified as the SW drag (D10), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving Leg 3.

(20) One (1) enclosed drag conveyor, identified as the NW drag (D11), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving Leg 3.

(21) One (1) enclosed drag conveyor, identified as the SE drag (D12), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving Leg 3.

(22) One (1) enclosed drag conveyor, identified as the NE drag (D13), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving Leg 3.

(23) One (1) enclosed auger system, constructed in 1972, with emissions exhausted to the atmosphere, and consisting of the following:

(1) One (1) enclosed auger, identified as B BIN auger (A1), with a maximum throughput rate of 4,000 bushels per hour (120 tons/hr), serving Legs 1 & 2.

(2) Two (2) enclosed augers, with a maximum throughput rate of 3,500 bushels per hour (105 ton/hr), identified as NW PAD auger (A2) and SW PAD auger

(A3), which transfer grain to the outdoor temporary storage piles. The NW PAD auger serves the WEST PAD (XT2) and the SW PAD auger serves the WEST PAD (XT2).

(d) One (1) Storage system, identified as STORAGE, constructed in 1972, with emissions exhausted to the atmosphere, and consisting of the following:

(1) Four (4) metal storage tanks, identified as SE (T3), NE (T4), SW (T13), and NW (T14), constructed in 1987, with a combined storage capacity of 126,740 bushels (3802 tons) and a maximum unload capacity of 6,000 bushels per hour (180 tons/hr). Each of these four tanks are vented to the atmosphere, with each tank having four vents labeled a, b, c, and d, respectively. SE (T3) & NE (T4) have truck loadout spouts.

(2) Four (4) headhouse storage bins, identified as EAST (T6), NORTH (T7), WEST (T8), and SOUTH (T9), constructed in 1972, with a total storage capacity of 98,052 bushels, and with a total maximum throughput rate of 8,000 bushels per hour (240 tons/hr), vented to the atmosphere through vents 6a, 7a, 8a, & 9a, respectively. SOUTH (T8) is equipped with a truck loadout spout.

(3) One (1) metal storage tank, identified as the BIG TANK (T5), constructed in 1972, with storage capacity of 353,489 bushels (10,605 tons) and a maximum unload capacity of 8,000 bushels per hour (240 tons/hr), vented to the atmosphere through vent 5a & 5b. The BIG TANK (T5) has a truck loadout spout.

(4) One (1) metal storage tank, identified as BROCK (T18), constructed in 1987, with storage capacity of 273,198 bushels (8196 tons) and a maximum unload capacity of 10,000 bushels per hour (300 tons/hr), vented to the atmosphere through ten vents, identified as vents 18 a-j.

(5) Three (3) metal storage tanks, identified as DIRTY (T19), CLEAN YELLOW (20), and CLEAN WHITE (21), constructed in 1972, with a combined storage capacity of 6,193 bushels (186 tons) and a maximum unload capacity of 6,000 bushels per hour (180 tons/hr).

(6) Three (3) concrete silos, identified as B1 (S10), B2 (S11), B3 (S12) constructed in 1977, with a combined storage capacity of 303,464 bushels (9104 tons) and a maximum unload capacity of 15,000 bushels per hour (450 tons/hr), vented to the atmosphere through vents 10a & b, 11a & b, and 12a &b, respectively. Silos B1, B2, and B3 have truck loadout spouts.

(7) One (1) temporary outdoor storage pile, on a concrete surface, covered by tarpaulin, identified as WEST PAD (XT2), with a capacity of 1,001,000 bushels of grain (30,030 tons), constructed in 1972, with dimensions of 145 feet x 500 feet.

(8) One (1) temporary outdoor storage pile, on a gravel surface, covered by tarpaulin, identified as EAST PAD (XT9), with a capacity of 1,666,000 bushels of grain (49,980 tons), constructed in 2006, with dimensions of 185 feet x 500 feet.

(e) One (1) grain loadout operation, identified as SHIPPING, constructed in 1972, with emissions exhausted to the atmosphere, consisting of the following:

(1) Two (2) railcar loadout bins, identified as 1RN and 1RS, with telescoping spouts, each with a maximum loadout capacity of 52,500 bushels per hour (1,575 tons/hr).

(2) One (1) truck loadout bin, identified as 3L, with a maximum loadout capacity of 8,000 bushels per hour (240 tons/hr).

(3) One (1) truck loadout bin, identified as 1L, with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(4) Eleven (11) side draw truck loadout spouts, each with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(5) Two (2) steel loadout tanks, identified as SOUTH LOADOUT Tank (T15) & NORTH LOADOUT Tank (T16), constructed in 1972, with a combined storage capacity of 9,310 bushels (279 tons) and a maximum loadout capacity of 52,500 bushels per hour (1,575 tons/hr), vented to the atmosphere through vents #15a & 16a, respectively.

(6) One (1) steel overhead loadout bin, identified as #3 OVERHEAD Tank (17), constructed in 1972, and a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr), equipped with a loadout spout, with a storage capacity of 1,989 bushels (60 tons).

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

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

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

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

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

$$E = 55.0\ P^{0.11} - 40$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

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

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (tons/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)
Truck Loadout Spouts (11)	10,000	300	63.0
Rail Loadout Spouts 1RN, !RS	52,500	1,575	83.6
40,000 Belt (B1)	40,000	1,200	80.0
Loadout Drag (D8)	30,000	900	76.2
B2, B3 bottom Drag (D7)	20,000	600	71.2
B1 bottom Drag (D6)	20,000	600	71.2
East pad Belt (B2)	20,000	600	71.2
Pit #1 (P1)	15,000	450	67.7
Leg 1 (L1)	15,000	450	67.7
#1 Pit Drag (D1)	15,000	450	67.7
Pit #3 Drag (D3)	10,000	300	63.0
Brock Drag (D9)	10,000	300	63.0
Brock Reclaim (D16)	10,000	300	63.0
Pit #2 (P2)	8,000	240	60.5
Leg 2 (L2)	8,000	240	60.5
#2 Pit Drag (D2)	8,000	240	60.5
Dry Leg (L7)	8,000	240	60.5
B2, B3 top Drag (D5)	8,000	240	60.5
B1 top Drag (D4)	8,000	240	60.5
Big Tank Belt (B3)	8,000	240	60.5
Big Tank reclaim (D15)	8,000	240	60.5
Pit #3 (P3)	6,000	180	57.4
Leg 3 (L3)	6,000	180	57.4
WET Leg (L6)	6,000	180	57.4
WHITE Leg (L4)	6,000	180	57.4
NE Drag (D13)	6,000	180	57.4
SE Drag (D12)	6,000	180	57.4
NW Drag (D11)	6,000	180	57.4
SW Drag (D10)	6,000	180	57.4
B bin Auger (A1)	4,000	120	53.1
NORTH Leg (L5)	4,000	120	53.1
SW pad Auger (A3)	3,500	105	51.8
NW pad Auger (A2)	3,500	105	51.8
Truck Loadout bin #1L	10,000	300	63.0
Truck Loadout bin #3L	8,000	240	60.5

* Mineral oil is sprayed on all grain when it is received and after drying. The minimum control efficiency for mineral oil is 60% AP-42, Section 9.9.1.2.1 (04/03).

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

In order to comply with these limits, mineral oil shall be applied to all grain as it is received at this facility and after drying.

D.1.2 New Source Performance Standards for Grain Elevators Requirements [40 CFR Part 60, Subpart DD] [326 IAC 12]

Pursuant to 40 CFR 60.301(d), the outside storage piles, identified XT3 and XT9, shall be classified as non-permanent, therefore, this source is not considered a grain terminal elevator.

Pursuant to 40 CFR 60.301(f), this souce is not considered as a grain storage elevator because it is not associated with any mill or oil extraction plant.

Therefore, 40 CFR 60.300 Subpart DD does not apply to this source.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Condition D.1.1, mineral oil shall be applied to all grain upon receipt at this facility and after drying in order to control particulate emissions from the receiving, handling, drying, and shipping areas at all times these facilities are in operation. Oil shall be applied at a rate of 0.5-1.7 gallons of oil per thousand bushels of grain received.

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

D.1.5 Visible Emissions Notations

(a) Visible emission notations of the grain receiving, handling, drying, and shipping facilities shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.6 Monitoring

(a) To monitor the performance of the mineral oil application operation, the Permittee shall perform weekly inspections of the mineral oil application equipment, including:

(1) recording the pressure, in pounds per square inch (p.s.i.), of the oil sprayer system and

(2) visually verifying the placement and operation of the oil sprayer system.

When for any one reading, the pressure is outside the normal range of 10 to 25 pounds per square inch (p.s.i.) or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C.15- 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.15 - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.7 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.4 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken weekly and shall be complete and sufficient to establish compliance with the mineral oil usage requirement established in Condition D.1.1.

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

(2) Actual mineral oil usage per week,

(3) Actual receipt of grain in bushels per week,

(4) Calculate and record the rate of oil applied per one thousand bushels of grain using the equation:

$$\frac{O}{\left(\frac{G}{1000}\right)} = \textit{Application Rate (gal/kbu)}$$

where O = Weekly Mineral oil usage in gallons and
G = Weekly receipt of grain in bushels.

When for any one reading, the application rate is outside the normal range of 0.5 to 1.7 gallons of oil per 1000 bushels of grain or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C.15- Response to Excursions or Exceedances. An application rate that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C.15 - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(5) Record the date and time of the visual inspection of the mineral oil application equipment. The Permittee shall include in its weekly record when an equipment inspection notation is not taken and the reason for the lack of an equipment inspection notation (e.g., the plant did not operate that day).

(6) Record the pressure, in pounds per square inch (p.s.i.), of the oil spray system. This reading shall be taken at a time when these facilities are in operation. The Permittee shall include in its weekly record when a pressure notation is not taken

and the reason for the lack of a pressure notation (e.g., the plant did not operate that day).

(b) To document compliance with Condition D.1.5, the Permittee shall maintain once per day records of the visible emission notations from the grain receiving, handling, drying, and shipping facilities. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).

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

(d) Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]: Insignificant Activities

(f) Underground conveyors. [326 IAC 2-7-1(21)(G)(xiv)]

(g) Paved roads and parking lots with public access. [326 IAC 6-4]

(h) A gasoline fuel 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 capacity less than or equal to 10,500 gallons. Such storage tanks may be in a fixed location or on mobile equipment. [326 IAC 2-7-1(21)(G)(ii)]

(i) Pressurized storage tanks and associated piping for Acetylene. [326 IAC 2-7-1(40)(J)]

(j) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings. Mineral oil is applied to all grain upon receipt and after drying. [326 IAC 2-7-1(21)(G)(vi)]

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

Page intentionally left blank.

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:	Gavilon Grain, LLC dba Peavey Company-Shelburn
Address:	7646 North 125 East
City:	Shelburn, Indiana 47879
Phone #:	812-397-5710
MSOP #:	M153-25653-00038

I hereby certify that Gavilon Grain, LLC dba Peavey Company-Shelburn is :

- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Gavilon Grain, LLC dba Peavey Company-Shelburn is :

- ☐ in compliance with the requirements of MSOP M153-25653-00038.
- ☐ not in compliance with the requirements of MSOP M153-25653-00038.

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:

Page intentionally left blank.

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:

_____

_____

Attachment A

FUGITIVE PARTICULATES CONTROL PLAN

for

GAVILON GRAIN, LLC DBA PEAVEY COMPANY-SHELBURN

Name and address of the source:

Gavilon Grain, LLC dba Peavey Company-Shelburn
7646 N. Co. Rd. 125 E
Shelburn, IN 47879

Name and address of the owner or operator responsible for the execution of the plan:

Brian Carleton
Director of Operations
Gavilon Grain, LLC
11 ConAgra Drive, 11-160
Omaha, NE 68102

(a) Fugitive particulate matter (dust) emissions from paved roads, unpaved roads, and parking lots shall be controlled by one or more of the following measures on an as needed basis:

(1) Paved roads and parking lots:
- (A) flushing on an as needed basis; and/or
- (B) power brooming while wet either from rain or application of water on an as needed basis.

(2) Unpaved roads and parking lots:
- (A) treating with emulsified asphalt (or other suitable and effective oil or chemical dust suppressant approved by IDEM OAQ) on an as needed basis;
- (B) treating with water on an as needed basis; and/or
- (C) double chipping, sealing, and maintaining the road surface on an as needed basis.

(b) Fugitive particulate matter (dust) emissions from the loading and unloading of grain shall be controlled by one or more of the following measures on an as needed basis:
- (1) limiting free fall distance;
- (2) adding socks/sleeves to loading spouts;
- (3) limiting the rate of discharge of the materials; and/or
- (4) applying mineral oil to the grain as soon as it is received and after it passes through the dryer.

(c) Fugitive particulate matter (dust) emissions from grain handling, including pits, bins, silos, scales, conveyors, drags, legs, augers, transfer points, screens, trippers, garners, and/or dryers shall be controlled by one or more of the following measures:
- (1) limiting transfer points to three foot drops or less;
- (2) enclosing or partially enclosing: pits, conveyors, transfer points, augers, drags, legs, screens, and/or dryers; and/or
- (3) applying mineral oil to the grain as soon as it is received and after it passes through the dryer.

(d) Fugitive particulate matter emissions resulting from open aggregate piles consisting of such material as, but not limited to, sand, gravel, stone, grain, and coal shall be controlled by one or

more of the following measures on an as needed basis:

(A) Cleaning the area around the perimeter of the aggregate piles;
(B) Application of a suitable and effective oil or other dust suppressant;
(C) Covering pile with a tarpaulin to minimize wind erosion; and/or
(D) An equivalent alternate measure.

(e) Fugitive particulate matter emissions resulting from outdoor conveying of aggregate material such as, but not limited to, sand, gravel, stone, grain, and coal, by equipment such as belt conveyors, augers, drags, and bucket elevators shall be controlled by one or more of the following measures:

(1) Enclosing the conveyor belt totally on the top and sides as needed to minimize visible emissions;
(2) Applying suitable and effective chemical dust suppressant (mineral oil) at the feed and/or intermediate points as needed to minimize visible emissions; and/or
(3) An equivalent alternate measure.

(f) Fugitive particulate matter emissions resulting from the transferring of aggregate material shall be controlled unless exempted pursuant to 326 IAC 6-5-7(d) by one or more of the following measures:

(1) Minimizing the vehicular distance between the transfer points;
(2) Enclosing the transfer points;
(3) Application of suitable and effective chemical dust suppressant as needed to minimize visible emissions; and/or
(4) An equivalent alternate measure.

(g) Fugitive particulate matter emissions resulting from transportation of aggregate material by truck, front end loaders, or similar vehicles shall be controlled unless exempted pursuant to 326 IAC 6-5-7(d) by one or more of the following measures:

(1) Use of completely enclosed vehicles;
(2) Tarping the vehicle;
(3) Maintaining the vehicle body in such a condition that prevents any leaks of aggregate material.
(4) Spraying the materials in the vehicle with a suitable and effective dust suppressant; and/or
(5) An alternate measure.

(h) Fugitive particulate matter emissions resulting from the loading and unloading operations of the material from storage facilities such as bins, hoppers, and silos, onto or out of vehicles, shall be controlled by one or more of the following measures:

(1) Total or partial enclosure of the material loading/unloading area;
(2) Spraying with suitable and effective chemical dust suppressant as needed to minimize visible emissions;
(3) Reduction of free fall distance; and/or
(4) An equivalent alternate measure.

(i) The grain elevator will follow 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
(A) Areas to be swept and maintained shall include, at a minimum, the following:
- General grounds, yard, and other open areas.

- Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
- 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

Page intentionally left blank.

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Gavilon Grain, LLC dba Peavey Company-Shelburn
7646 North 125 East
Shelburn, Indiana 47879

Affidavit of Construction

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

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

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

3. By virtue of my position with _____, I have personal
(Company Name)

knowledge of the representations contained in this affidavit and am authorized to make these representations

on behalf of _____.
(Company Name)

4. I hereby certify that Gavilon Grain, LLC dba Peavey Company-Shelburn 7646 North 125 East, Shelburn, Indiana 47879, completed construction of the grain processing and storage facility on _____, in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on December 13, 2007 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M153-25653-00038, Plant ID No. 153-00038 issued on _____.

5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature_____

Date_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County

and State of Indiana on this _____ day of _____, 20 _____. My Commission expires:

.

Signature_____

Name_____
(typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a New Source Construction and Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name:	**Gavilon Grain, LLC dba Peavey Company-Shelburn**
Source Location:	**7646 North 125 East, Shelburn, Indiana 47879**
County:	**Sullivan**
SIC Code:	**5153**
Operation Permit No.:	**153-25653-00038**
Permit Reviewer:	**Sandra Carr**

On April 18, 2008, the Office of Air Quality (OAQ) had a notice published in Sullivan Daily Times, Sullivan, Indiana, stating that ConAgra Foods, Inc dba Peavey Grain-Shelburn had applied for a MSOP to construct and operate a new grain processing and storage facility. The notice also stated that the OAQ proposed to issue a MSOP 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.

Comments and Responses

No comments were received during the public notice period which ended May 18, 2008.

Explanation of Modification

On May 18, 2008, the Office of Air Quality (OAQ) received an email from the source requesting that the permit be updated to indicate a change in ownership and company name change to Gavilon Grain, LLC dba Peavey Company-Shelburn.

Justification for the Modification

The Minor Source Operating Permit (MSOP) is being modified through an Addendum to the Technical Support Document (ATSD). This change to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3) because the change involves the revision of permit language where the revisions will not trigger a new requirement or violate an existing permit term.

Proposed Changes

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. 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.

All occurrences of the company name in MSOP No. M153-25653-00038 were updated to reflect the transfer of ownership from ConAgra Foods, Inc dba Peavey Grain-Shelburn to the new owner, Gavilon Grain, LLC dba Peavey Company-Shelburn.

State Rule Applicability Determination

State rules and compliance monitoring applicabilities shall remain unchanged as a result of this Addendum.

Recommendation

The staff recommends to the Commissioner that this Minor Source Operating Permit (MSOP) be approved.

(a) Questions regarding this MSOP can be directed to Sandra Carr at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-5372) or toll free at 1-800-451-6027 extension (4-5372).

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

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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	**ConAgra Foods, Inc. dba Peavey Grain-Shelburn**
Source Location:	**7646 North 125 East, Shelburn, Indiana 47879**
County:	**Sullivan**
SIC Code:	**5153**
Operation Permit No.:	**153-25653-00038**
Permit Reviewer:	**Sandra Carr**

On December 13, 2007, the Office of Air Quality (OAQ) has received an application from ConAgra Foods, Inc. dba Peavey Grain-Shelburn related to the construction and operation of a new stationary grain elevator for corn, wheat, or soybeans.

History

Graham Grain Company, Sullivan County Indiana, began operations in 1972. IDEM OAQ has no record of any construction or operation permit being requested or issued to Graham Grain Company in Sullivan County. In 1987, ConAgra Foods, Inc. purchased Graham Grain Company. Peavey Grain is the grain processing branch of ConAgra Foods, Inc. ConAgra Foods, Inc. is doing business as Peavey Grain-Shelburn.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Sullivan 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.

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

(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. Sullivan County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Sullivan County has been classified as attainment for $PM_{2.5}$. The 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 PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions.

(c) Other Criteria Pollutants
Sullivan 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.

Fugitive Emissions

(a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

(b) This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard, therefore, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission unit*(s)*:

(a) One (1) enclosed grain receiving operation, identified as RECEIVING, constructed in 1972, and consisting of the following:

(1) One (1) truck dump pit, identified as Pit #1, with a maximum capacity of 15,000 bushels per hour (450 tons/hr), with emissions exhausted to the atmosphere. Mineral oil is applied to all grain upon receipt.

(2) One (1) truck dump pit, identified as Pit #2, with a maximum capacity of 8,000 bushels per hour (240 tons/hr), with emissions exhausted to the atmosphere. Mineral oil is applied to all grain upon receipt.

(3) One (1) truck dump pit, identified as Pit #3, with a maximum capacity of 6,000 bushels per hour (180 tons/hr), with emissions exhausted to the atmosphere. Mineral oil is applied to all grain upon receipt.

(b) One (1) column grain dryer, with a natural gas-fired, low emission cyclone burner, identified as DRYER1, constructed in 1998, with a plate perforation diameter of 0.07 inches, with a maximum heat input capacity of 41.96 MMBtu/hr and a maximum throughput rate of 4,700 bushels of grain per hour (140 tons/hr). The dryer is loaded by the Wet Leg (6) & emptied by the Dry Leg (7). Mineral oil is applied to all grain after it is processed in DRYER1.

(c) One (1) grain handling system, identified as HANDLING, constructed in 1972, with emissions exhausted to the atmosphere, and consisting of the following:

(1) One (1) enclosed receiving pit drag, identified as Pit 1 Drag, rated at 15,000 bushels per hour (450 tons/hr), constructed in 2001, empties Pit #1 and supplies Leg 1.

(2) One (1) enclosed receiving leg, identified as Leg 1, rated at 15,000 bushels per hour (450 tons/hr), constructed in 2001, and serving bins 5-10, drags 4, 8, and 14.

(3) One (1) enclosed receiving pit drag, identified as Pit 2 Drag, rated at 8,000 bushels per hour (240 tons/hr), constructed in 1972, empties Pit #2 and supplies Leg 2.

(4) One (1) enclosed receiving leg, identified as Leg 2, rated at 8,000 bushels per hour (240 tons/hr), constructed in 1972, and serving bins 5-10, drags 4, 8, and 14.

(5) One (1) enclosed receiving pit drag, identified as Pit 3 Drag, rated at 10,000 bushels per hour (280 tons/hr), constructed in 2007, empties Pit #3 and supplies Leg 3.

(6) One (1) enclosed receiving leg, identified as Leg 3, rated at 6,000 bushels per hour (180 tons/hr), constructed in 1972, and serving bins 3, 4, 13, 14, and 17, and drag 16.

(7) One (1) enclosed headhouse, identified as HH1, constructed in 1972, consisting of a feed Legs 1 & 2 (L1, L2), a distributor, and feeding onto drags 4 and 8, with a maximum throughput rate of 4,700 bushels of grain per hour (140 tons/hr), with emissions exhausted to the atmosphere.

(8) One (1) open belt conveyor, identified as BELT 2 (B2), constructed in 2006, rated as 20,000 bushels per hour (600 tons/hr), serving Belt 1.

(9) One (1) enclosed handling leg, identified as the WHITE Leg (L4), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving the scales, bins 8 & 9 and drag 14.

(10) One (1) enclosed handling leg, identified as the NORTH Leg (L5), constructed in 1972, rated at 4,000 bushels per hour (120 tons/hr), serving the loadout scales and drag 4.

(11) One (1) enclosed belt handling conveyor, identified as the 40,000 Belt (B1), constructed in 2006, rated at 40,000 bushels per hour (1200 tons/hr), serving the East PAD (XT9) ground pile.

(12) One (1) enclosed belt handling conveyor, identified as the BIG TANK Belt (B3), constructed in 1972, rated at 8,000 bushels per hour (240 tons/hr), serving the receiving pit drag 2.

(13) One (1) enclosed drag conveyor, identified as the B1 TOP drag (D4), constructed in 1972, rated at 8,000 bushels per hour (240 tons/hr), serving bin 10 and drag 5.

(14) One (1) enclosed drag conveyor, identified as the B2, B3 TOP drag (D5), constructed in 1972, rated at 8,000 bushels per hour (240 tons/hr), serving bins 11 and 12.

(15) One (1) enclosed drag conveyor, identified as the B1 BOTTOM drag (D6), constructed in 2003, rated at 20,000 bushels per hour (600 tons/hr), serving Leg 1.

(16) One (1) enclosed drag conveyor, identified as the B2, B3 BOTTOM drag (D7), constructed in 2003, rated at 20,000 bushels per hour (600 tons/hr), serving drag 6.

(17) One (1) enclosed drag conveyor, identified as the LOADOUT drag (D8), constructed in 2007, rated at 30,000 bushels per hour (900 tons/hr), serving bins 15 & 16..

(18) One (1) enclosed drag conveyor, identified as the BROCK drag (D9), constructed in 1972, rated at 10,000 bushels per hour (300 tons/hr), serving bin 18.

(19) One (1) enclosed drag conveyor, identified as the SW drag (D10), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving Leg 3.

(20) One (1) enclosed drag conveyor, identified as the NW drag (D11), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving Leg 3.

(21) One (1) enclosed drag conveyor, identified as the SE drag (D12), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving Leg 3.

(22) One (1) enclosed drag conveyor, identified as the NE drag (D13), constructed in 1972, rated at 6,000 bushels per hour (180 tons/hr), serving Leg 3.

(23) One (1) enclosed auger system, constructed in 1972, with emissions exhausted to the atmosphere, and consisting of the following:

(1) One (1) enclosed auger, identified as B BIN auger (A1), with a maximum throughput rate of 4,000 bushels per hour (120 tons/hr), serving Legs 1 & 2.

(2) Two (2) enclosed augers, with a maximum throughput rate of 3,500 bushels per hour (105 ton/hr), identified as NW PAD auger (A2) and SW PAD auger (A3), which transfer grain to the outdoor temporary storage piles. The NW PAD auger serves the WEST PAD (XT2) and the SW PAD auger serves the WEST PAD (XT2).

(d) One (1) Storage system, identified as STORAGE, constructed in 1972, with emissions exhausted to the atmosphere, and consisting of the following:

(1) Four (4) metal storage tanks, identified as SE (T3), NE (T4), SW (T13), and NW (T14), constructed in 1987, with a combined storage capacity of 126,740 bushels (3802 tons) and a maximum unload capacity of 6,000 bushels per hour (180 tons/hr). Each of these four tanks are vented to the atmosphere, with each tank having four vents labeled a, b, c, and d, respectively. SE (T3) & NE (T4) have truck loadout spouts.

(2) Four (4) headhouse storage bins, identified as EAST (T6), NORTH (T7), WEST (T8), and SOUTH (T9), constructed in 1972, with a total storage capacity of 98,052 bushels, and with a total maximum throughput rate of 8,000 bushels per hour (240 tons/hr), vented to the atmosphere through vents 6a, 7a, 8a, & 9a, respectively. SOUTH (T8) is equipped with a truck loadout spout.

(3) One (1) metal storage tank, identified as the BIG TANK (T5), constructed in 1972, with storage capacity of 353,489 bushels (10,605 tons) and a maximum unload capacity of 8,000 bushels per hour (240 tons/hr), vented to the atmosphere through vent 5a & 5b. The BIG TANK (T5) has a truck loadout spout.

(4) One (1) metal storage tank, identified as BROCK (T18), constructed in 1987, with storage capacity of 273,198 bushels (8196 tons) and a maximum unload capacity of 10,000 bushels per hour (300 tons/hr), vented to the atmosphere through ten vents, identified as vents 18 a-j.

(5) Three (3) metal storage tanks, identified as DIRTY (T19), CLEAN YELLOW (20), and CLEAN WHITE (21), constructed in 1972, with a combined storage capacity of 6,193 bushels (186 tons) and a maximum unload capacity of 6,000 bushels per hour (180 tons/hr).

(6) Three (3) concrete silos, identified as B1 (S10), B2 (S11), B3 (S12) constructed in 1977, with a combined storage capacity of 303,464 bushels (9104 tons) and a maximum unload capacity of 15,000 bushels per hour (450 tons/hr), vented to the atmosphere through vents 10a & b, 11a & b, and 12a &b, respectively. Silos B1, B2, and B3 have truck loadout spouts.

(7) One (1) temporary outdoor storage pile, on a concrete surface, covered by tarpaulin, identified as WEST PAD (XT2), with a capacity of 1,001,000 bushels of grain (30,030 tons), constructed in 1972, with dimensions of 145 feet x 500 feet.

(8) One (1) temporary outdoor storage pile, on a gravel surface, covered by tarpaulin, identified as EAST PAD (XT9), with a capacity of 1,666,000 bushels of grain (49,980 tons), constructed in 2006, with dimensions of 185 feet x 500 feet.

(e) One (1) grain loadout operation, identified as SHIPPING, constructed in 1972, with emissions exhausted to the atmosphere, consisting of the following:

(1) Two (2) railcar loadout bins, identified as 1RN and 1RS, with telescoping spouts, each with a maximum loadout capacity of 52,500 bushels per hour (1,575 tons/hr).

(2) One (1) truck loadout bin, identified as 3L, with a maximum loadout capacity of 8,000 bushels per hour (240 tons/hr).

(3) One (1) truck loadout bin, identified as 1L, with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(4) Eleven (11) side draw truck loadout spouts, each with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(5) Two (2) steel loadout tanks, identified as SOUTH LOADOUT Tank (T15) & NORTH LOADOUT Tank (T16), constructed in 1972, with a combined storage capacity of 9,310 bushels (279 tons) and a maximum loadout capacity of 52,500 bushels per hour (1,575 tons/hr), vented to the atmosphere through vents #15a & 16a, respectively.

(6) One (1) steel overhead loadout bin, identified as #3 OVERHEAD Tank (17), constructed in 1972, and a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr), equipped with a loadout spout, with a storage capacity of 1,989 bushels (60 tons).

Insignificant Activities

(f) Underground conveyors. [326 IAC 2-7-1(21)(G)(xiv)]

(g) Paved roads and parking lots with public access. [326 IAC 6-4]

(h) A gasoline fuel 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 capacity less than or equal to 10,500 gallons. Such storage tanks may be in a fixed location or on mobile equipment. [326 IAC 2-7-1(21)(G)(ii)]

(i) Pressurized storage tanks and associated piping for Acetylene. [326 IAC 2-7-1(40)(J)]

(j) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings. Mineral oil is applied to grain upon receipt and after drying. [326 IAC 2-7-1(21)(G)(vi)]

Enforcement Issues

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed approval is intended to satisfy the requirements of the construction and operation permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Unlimited Potential To Emit (tons/year)
PM	102.85
PM_{10} (1)	35.37
$PM_{2.5}$	6.57
SO_2	0.11
NO_x	18.38
VOC	1.01
CO	15.44

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM_{10}), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Unlimited Potential To Emit (tons/year)
Lead	0.0001
Hexane	0.3200
Formaldehyde	0.0138
Toluene	0.0006
Benzene	0.0004
TOTAL HAPs	**0.35**

Criteria Pollutants

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of PM_{10} is less than one hundred (100) tons per year but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

(b) Based on emission factors from EPA's Compilation of Air Pollutant Emission Factors AP-42, Section 9.9.1, Grain Elevators And Processes, IDEM has determined that grain elevator sources with shipping or receiving of grain greater than ten million (10,000,000) U.S. bushels per year will have the PTE of PM_{10} greater than twenty-five (25) tons per year.

Since this source's unlimited PTE of PM_{10} is greater than twenty-five (25) tons per year, a New Source Review Permit for approval to construct is required for this operation pursuant to 326 IAC 2-5.1-3(a)(1)(E).

(c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) 40 CFR Subpart 60.300, Subpart DD - Standards of Performance for Grain Elevators
The New Source Performance Standard, 326 IAC 12, 40 CFR Part 60, Subpart DD (Standards of Performance for Grain Elevators) are not included in this permit, although the combined storage capacity of the outdoor storage piles, identified as XT2 and XT9, are greater than 2.5 million bushels, because these storage piles, with a maximum storage capacity of 1.0 and 1.7 million bushels of grain, respectively, are classified as non-permanent based on the definition in 40 CFR 60.301(d). Therefore, this source is also not considered as a grain terminal elevator as defined in 40 CFR 60.301(c) because the permanent storage capacity is less than 2.5 million bushels. This source is also not considered as a grain storage elevator as defined in 40 CFR 60.301(f) because it is not associated with any mill or oil extraction plant.

For the reasons cited above, all other emission units at the facility including truck unloading and loading stations, internal grain handling, grain receiving, shipping and dryers are not subject to the requirements of 40 CFR Part 60.300, Subpart DD.

(b) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

(d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

(a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 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) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

(d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

(e) 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:

(1) 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.

(2) 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.

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

(g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is subject to 326 IAC 6-5, since it is a new source of fugitive particulate matter emissions, requiring a permit as set forth in 326 IAC 2, and which has not received all the necessary preconstruction approvals before December 13, 1985. Pursuant to 326 IAC 6-5, a fugitive dust control plan must be submitted, reviewed and approved. A fugitive dust plan was submitted on 3/14/2008. The plan is included as Attachment A.

State Rule Applicability – Entire Facility

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following operations shall not exceed the pound per hour limits listed in the table below:

The pounds per hour limitations were calculated using the following equation:

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

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

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

In order to comply with these limits, mineral oil shall be applied to all grain as it is received.

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (tons/hr)	PM Emissions Before Control (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)	PM Emissions After Control (lbs/hr)
Truck Loadout Spouts (11)	10,000	300	25.8	63.0	10.3
Rail Loadout Spouts 1RN, 1RS	52,500	1,575	42.5	83.6	17.0
40,000 Belt (B1)	40,000	1,200	73.2	80.0	29.3
Loadout Drag (D8)	30,000	900	54.9	76.2	22.0
B2, B3 bottom Drag (D7)	20,000	600	36.6	71.2	14.6
B1 bottom Drag (D6)	20,000	600	36.6	71.2	14.6
East pad Belt (B2)	20,000	600	36.6	71.2	14.6
Pit #1 (P1)	15,000	450	81.0	67.7	32.4
Leg 1 (L1)	15,000	450	27.5	67.7	11.0
#1 Pit Drag (D1)	15,000	450	27.5	67.7	11.0
Pit #3 Drag (D3)	10,000	300	18.3	63.0	7.3
Brock Drag (D9)	10,000	300	18.3	63.0	7.3
Brock Reclaim (D16)	10,000	300	18.3	63.0	7.3
Pit #2 (P2)	8,000	240	43.2	60.5	17.3
Leg 2 (L2)	8,000	240	14.6	60.5	5.9
#2 Pit Drag (D2)	8,000	240	14.6	60.5	5.9
Dry Leg (L7)	8,000	240	14.6	60.5	5.9
B2, B3 top Drag (D5)	8,000	240	14.6	60.5	5.9
B1 top Drag (D4)	8,000	240	14.6	60.5	5.9
Big Tank Belt (B3)	8,000	240	14.6	60.5	5.9
Big Tank reclaim (D15)	8,000	240	14.6	60.5	5.9
Pit #3 (P3)	6,000	180	32.4	57.4	13.0
Leg 3 (L3)	6,000	180	11.0	57.4	4.4
WET Leg (L6)	6,000	180	11.0	57.4	4.4
WHITE Leg (L4)	6,000	180	11.0	57.4	4.4
NE Drag (D13)	6,000	180	11.0	57.4	4.4
SE Drag (D12)	6,000	180	11.0	57.4	4.4
NW Drag (D11)	6,000	180	11.0	57.4	4.4
SW Drag (D10)	6,000	180	11.0	57.4	4.4
B bin Auger (A1)	4,000	120	7.3	53.1	2.9
NORTH Leg (L5)	4,000	120	7.3	53.1	2.9
SW pad Auger (A3)	3,500	105	6.4	51.8	2.6
NW pad Auger (A2)	3,500	105	6.4	51.8	2.6
Truck Loadout bin #1L	10,000	300	25.8	63.0	10.3
Truck Loadout bin #3L	8,000	240	20.6	60.5	8.3

** Mineral oil is sprayed on all grain when it is received and after drying. The minimum control efficiency for mineral oil is 60% AP-42, Section 9.9.1.2.1 (04/03).*

(h) There are no 326 IAC 8 Rules that are applicable to the grain elevator because the PTE VOC is less than 15 pounds per day (lb/day).

Compliance Determination, Monitoring and Testing Requirements

There are no testing requirements applicable to this source.

Conclusion and Recommendation

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 December 13, 2007.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. 153-25653-00038. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Sandra Carr at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5372 or toll free at 1-800-451-6027 extension 45372.

(b) A copy of the findings is available on the Internet at: www.in.gov/idem/permits/air/pending.html.

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

Appendix A: Emissions Calculations
Summary

Company Name: Gavilon Grain, LLC dba Peavey Company-Shelburn
Address City IN Zip: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-25653-00038
Reviewer: Sandra Carr
Application Date: December 13, 2007

Summary of Potential to Emit (PTE)

Pollutant	Emissions (Tons/yr)
PM	102.85
PM_{10}	35.37
$PM_{2.5}$	6.57
SO2	0.11
NOx	18.38
VOC	1.01
CO	15.44
Lead	0.0001
Hexane	0.33
Combined HAPs	0.35

Summary of Controlled Emissions

Pollutant	Emissions (Tons/yr)
PM	43.58
PM_{10}	15.49
$PM_{2.5}$	3.52
SO2	0.11
NOx	18.38
VOC	1.01
CO	15.44
Lead	0.0001
Hexane	0.33
Combined HAPs	0.35

Appendix A: Emissions Calculations
Compliance

Company Name: Gavilon Grain, LLC dba Peavey Company-Shelburn
Source Address: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-25653-00038
Reviewer: Sandra Carr
Date: December 13, 2007

In order to qualify for the MSOP program, this source must limit all criteria polluant emissions to <100 tons per year.

PM_{10} Emission Limit for Receiving, Drying, Internal handling, storage, & shipping pursuant to 326 IAC 2-6 (MSOP):

PM_{10} Emissions from other sources =		6.42				
(100 tons PM_{10}/yr -		6.42	tons PM_{10}/yr from other sources)			
=	93.58	tons PM_{10}/yr	=	21.36	lbs/hr	

(Will be able to comply)

Controlled PM_{10} emissions from the internal handling, drying, receiving, storage, and shipping are	2.64	lbs/hr which is	≤	21.36	lbs/hr	
Based on a maximum grain throughput of	499,837	tons/yr, this emission limit is equivalent to		0.374	lb PM_{10}/ ton	

PM Emission Limit for Receiving, Drying, Internal handling, storage, & shipping to render 326 IAC 2-2 (PSD) not applicable:

Source-wide emissions of PM must be less than 250 tons per year such that the requirements of 326 IAC 2-2 (PSD) are not applicable.
Therefore, PM from Receiving, Drying, Internal handling, storage, & shipping shall be limited as follows:

PM Emissions from other sources =		22.64				
(250 tons PM/yr -		22.64	tons PM/yr from other sources) =			
227.36	tons PM/yr	=		51.91	lbs/hr	

(Will be able to comply)

Controlled PM emissions from Receiving, Drying, Internal handling, storage, & shipping are	7.33	lbs/hr which is	≤	51.91	lbs/hr	
Based on a maximum grain throughput of	499,837	tons/yr, this emission limit is equivalent to		0.910	lb PM/ ton	

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

Company Name: Gavilon Grain, LLC dba Peavey Company-Shelburn
Address City IN Zip: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-25653-00038
Reviewer: Sandra Carr
Application Date: December 13, 2007

Allowable Emissions Under 326 IAC 6-3-2

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (tons/hr)	PM Emission Factor (lbs/ton)	Control Device(s)	Collection and Control Efficiency (%)	PM Emissions Before Control (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)	PM Emissions After Control (lbs/hr)
Truck Loadout Spouts (11)	10,000	300	0.086	Spouts	60%	25.8	63.0	10.3
Rail Loadout Spouts 1RN, !RS	52,500	1,575	0.027	Spouts	60%	42.5	83.6	17.0
40,000 Belt (B1)	40,000	1,200	0.061	Enclosed	60%	73.2	80.0	29.3
Loadout Drag (D8)	30,000	900	0.061	Enclosed	60%	54.9	76.2	22.0
B2, B3 bottom Drag (D7)	20,000	600	0.061	Enclosed	60%	36.6	71.2	14.6
B1 bottom Drag (D6)	20,000	600	0.061	Enclosed	60%	36.6	71.2	14.6
East pad Belt (B2)	20,000	600	0.061	Open	60%	36.6	71.2	14.6
Pit #1 (P1)	15,000	450	0.18	Enclosed	60%	81.0	67.7	32.4
Leg 1 (L1)	15,000	450	0.061	Enclosed	60%	27.5	67.7	11.0
#1 Pit Drag (D1)	15,000	450	0.061	Enclosed	60%	27.5	67.7	11.0
Pit #3 Drag (D3)	10,000	300	0.061	Enclosed	60%	18.3	63.0	7.3
Brock Drag (D9)	10,000	300	0.061	Enclosed	60%	18.3	63.0	7.3
Brock Reclaim (D16)	10,000	300	0.061	Enclosed	60%	18.3	63.0	7.3
Pit #2 (P2)	8,000	240	0.18	Enclosed	60%	43.2	60.5	17.3
Leg 2 (L2)	8,000	240	0.061	Enclosed	60%	14.6	60.5	5.9
#2 Pit Drag (D2)	8,000	240	0.061	Enclosed	60%	14.6	60.5	5.9
Dry Leg (L7)	8,000	240	0.061	Enclosed	60%	14.6	60.5	5.9
B2, B3 top Drag (D5)	8,000	240	0.061	Enclosed	60%	14.6	60.5	5.9
B1 top Drag (D4)	8,000	240	0.061	Enclosed	60%	14.6	60.5	5.9
Big Tank Belt (B3)	8,000	240	0.061	Enclosed	60%	14.6	60.5	5.9
Big Tank reclaim (D15)	8,000	240	0.061	Enclosed	60%	14.6	60.5	5.9
Pit #3 (P3)	6,000	180	0.18	Enclosed	60%	32.4	57.4	13.0
Leg 3 (L3)	6,000	180	0.061	Enclosed	60%	11.0	57.4	4.4
WET Leg (L6)	6,000	180	0.061	Enclosed	60%	11.0	57.4	4.4
WHITE Leg (L4)	6,000	180	0.061	Enclosed	60%	11.0	57.4	4.4
NE Drag (D13)	6,000	180	0.061	Enclosed	60%	11.0	57.4	4.4
SE Drag (D12)	6,000	180	0.061	Enclosed	60%	11.0	57.4	4.4
NW Drag (D11)	6,000	180	0.061	Enclosed	60%	11.0	57.4	4.4
SW Drag (D10)	6,000	180	0.061	Enclosed	60%	11.0	57.4	4.4
B bin Auger (A1)	4,000	120	0.061	Enclosed	60%	7.3	53.1	2.9
NORTH Leg (L5)	4,000	120	0.061	Enclosed	60%	7.3	53.1	2.9
SW pad Auger (A3)	3,500	105	0.061	Enclosed	60%	6.4	51.8	2.6
NW pad Auger (A2)	3,500	105	0.061	Enclosed	60%	6.4	51.8	2.6
Truck Loadout bin #1L	10,000	300	0.086	Spouts	60%	25.8	63.0	10.3
Truck Loadout bin #3L	8,000	240	0.086	Spouts	60%	20.6	60.5	8.3

* Mineral oil is sprayed on all grain when it is received and after drying. The minimum control efficiency for mineral oil is 60% AP-42, Section 9.9.1.2.1 (04/03).

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate up to sixty thousand (60,000) pounds per hour (30 tons/hr):

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

Where the process weight rate is in excess of sixty thousand pounds per hour (30 tons/hr) calculate the allowable emissions using of the equation:

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

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

Methodology
Maximum Grain Throughput (tons/hr) = Maximum Grain Throughput (bushels/hr) x 60 (lbs/bushel) x 1 ton/2000 lbs
PTE of PM/PM_{10} Before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton)
PTE of PM/PM_{10} After Control (tons/yr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton) x (1- Control Efficiency (%))

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Gavilon Grain, LLC dba Peavey Company-Shelburn
Source Address: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-25653-00038
Reviewer: Sandra Carr
Date: December 13, 2007

Maximum Potential to Emit
Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
6-Wheel Vehicle (entering plant) (one-way trip)	1	80	80	7.5	600	1056	0.100	8	2920
6-Wheel Vehicle (leaving plant) (one-way trip)	1	80	80	17.5	1400	1056	0.100	8	2920
10-Wheel Vehicle (entering plant) (one-way trip)	1	80	80	10.0	800	1056	0.100	8	2920
10-Wheel Vehicle (leaving plant) (one-way trip)	1	80	80	27.5	2200	1056	0.100	8	2920
18-Wheel Vehicle (entering plant) (one-way trip)	1	80	80	12.5	1000	1056	0.100	8	2920
18-Wheel Vehicle (leaving plant) (one-way trip)	1	80	80	40.0	3200	1056	0.100	8	2920
		Total	**480**		**9200**			**48**	**17,520**

Average Vehicle Weight Per Trip = 19.2 tons/trip
Average Miles Per Trip = 0.10 miles/trip

Unmitigated Emission Factor, Ef = k*[(s/12)^a]*[(W/3)^b] (Equation 1a from AP-42 13.2.2)

	PM	PM_{10}	$PM_{2.5}$	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	2.6	2.6	2.6	% = mean % silt content of unpaved roads
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2)
W =	19.2	19.2	19.2	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365]
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM_{10}	$PM_{2.5}$	
Unmitigated Emission Factor, Ef =	3.87	0.87	0.09	lb/mile
Mitigated Emission Factor, Eext =	2.54	0.57	0.06	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM_{10} (tons/yr)	Unmitigated PTE of $PM_{2.5}$ (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM_{10} (tons/yr)	Mitigated PTE of $PM_{2.5}$ (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM_{10} (tons/yr)	Controlled PTE of $PM_{2.5}$ (tons/yr)
6-Wheel Vehicle (entering plant) (one-way trip)	5.65	1.27	0.13	3.72	0.84	0.08	1.86	0.42	0.04
6-Wheel Vehicle (leaving plant) (one-way trip)	5.65	1.27	0.13	3.72	0.84	0.08	1.86	0.42	0.04
10-Wheel Vehicle (entering plant) (one-way trip)	5.65	1.27	0.13	3.72	0.84	0.08	1.86	0.42	0.04
10-Wheel Vehicle (leaving plant) (one-way trip)	5.65	1.27	0.13	3.72	0.84	0.08	1.86	0.42	0.04
18-Wheel Vehicle (entering plant) (one-way trip)	5.65	1.27	0.13	3.72	0.84	0.08	1.86	0.42	0.04
18-Wheel Vehicle (leaving plant) (one-way trip)	5.65	1.27	0.13	3.72	0.84	0.08	1.86	0.42	0.04
	33.90	**7.64**	**0.76**	**22.29**	**5.03**	**0.50**	**11.15**	**2.51**	**0.25**

Methodology
Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)
The mean % silt content of unpaved roads is from the EPA website http://www.epa.gov/ttn/chief/ap42/ch13/related/c13s02-2.html

Abbreviations
PM = Particulate Matter
PM_{10} = Particulate Matter (≤10 µm)
$PM_{2.5}$ = Particulate Matter (≤2.5 µm)
PTE = Potential to Emit

Appendix A: Emissions Calculations
Grain Elevator (All Types)

Company Name: Gavilon Grain, LLC dba Peavey Company-Shelburn
Address City IN Zip: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-25653-00038
Reviewer: Sandra Carr
Application Date: December 13, 2007

Maximum Grain Received (bushels of grain handled or processed per year) =	16,661,244
Weight of grain (lb/bushel) =	60
Maximum Grain Received (tons of grain handled or processed per year) =	499,837

UNLOADING/RECEIVING						DRYING			SHIPPING					
Straight Truck			Hopper Truck			Column Dryer			Truck (unspecified)			Railcar		
PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$
0.18	0.059	0.010	0.035	0.0078	0.0013	0.22	0.055	0.0094	0.086	0.029	0.0049	0.027	0.0022	0.00037

Total number of steps = 2

Resulting throughput for headhouse/internal handling in tons/hr (number of steps * throughput) = 999675

	UNLOADING/ RECEIVING						DRYING**			HEADHOUSE AND INTERNAL HANDLING			STORAGE BIN (VENT)***			SHIPPING					
	Straight Truck (20%)			Hopper Truck (80%)			Column Dryer			(legs, belts, distributor, etc.)						Rail (95%)			Truck (5%)		
	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$
Emission Factor in lb/ton	0.18	0.059	0.010	0.035	0.0078	0.0013	0.22	0.055	0.0094	0.061	0.034	0.0058	0.05	0.0125	0.0011	0.027	0.0022	0.00037	0.086	0.029	0.0049
Potential Emissions in tons/yr	9.00	2.95	0.50	7.00	1.56	0.26	13.75	3.44	0.59	30.49	16.99	2.90	12.50	3.12	0.27	6.41	0.52	0.09	1.07	0.36	0.06
Controls (overall % efficiency)	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%
Controlled Potential Emissions in tons/yr	3.60	1.18	0.20	2.80	0.62	0.10	5.50	1.37	0.23	12.20	6.80	1.16	5.00	1.25	0.11	2.56	0.21	0.04	0.43	0.14	0.02

* Mineral oil is sprayed on the grain when it is received and after drying. The worst case control efficiency for mineral oil is 60% AP-42, Section 9.9.1.2.1 (04/03).
** The PM-10 emission factors given are estimated by taking 25% of the filterable PM emission factor in accordance with AP-42 Section 9.9.1, Table 9.9.1-1, Footnote j.
*** The PM emission factor given is from the interim AP-42 Section 9.9.1 (11/95). The PM-10 emission factor given is assumed to be equivalent to the filterable PM emission factor since no data was given.
Percentages for receiving, drying, & shipping and the number of headhouse steps were supplied by source. Results shown reflect that data. PTE=((annual throughput x reported%) x EF)/2000

Methodology
Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (Supplement D, 5/98) (exceptions are noted)
Potential Emissions in ton/yr = Throughput (ton/hr)* Emission factor (lb/ton) * 8760 (hours/day) / 2000 (lbs/ton)
Controlled Potential Emissions in ton/yr = Throughput (ton/hr)* Emission factor (lb/ton) * 8760 (hours/day) / 2000 (lbs/ton)* (1-Control Efficiency)

Step 4. Sum of emissions from all grain handling processes.

	PM	PM-10	PM2.5
Total Uncontrolled Emissions (tons/year)	80.21	28.95	4.67
Total Controlled Emissions (tons/year)	32.08	11.58	1.87

PM (lb/hr)	PM-10 (lb/hr)	PM2.5 (lb/hr)
18.31	6.61	1.07
7.33	2.64	0.43

Appendix A: Emissions Calculations
HAPs

Company Name: Gavilon Grain, LLC dba Peavey Company-Shelburn
Address City IN Zip: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-25653-00038
Reviewer: Sandra Carr
Application Date: December 13, 2007

Natural Gas Combustion

Maximum Heat Input Capacity MMBtu/hr	Maximum Potential Throughput MMCF/yr
41.96	367.6

Criteria Pollutants

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.349	1.397	0.110	18.38	1.011	15.44

*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

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.859E-04	2.205E-04	1.378E-02	3.308E-01	6.249E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	**Combined HAPs**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	9.189E-05	2.022E-04	2.573E-04	6.984E-05	3.859E-04	**0.347**

Methodology

All emission factors are based on normal firing.
Highest Individual HAP = Hexane 0.331
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 (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
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)
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.