



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: November 19, 2008

RE: ADM Grain Company / 173-26638-00011

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

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**ADM Grain Company
9521 W. State Road 662
Newburgh, Indiana 47630**

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

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

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

Operation Permit No.: M173-26638-00011	
Issued by/Original Signed By:	Issuance Date: November 19, 2008
Alfred C. Dumauual, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date: November 19, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary country grain elevator.

Source Address:	9521 W. State Road 662, Newburgh, Indiana 47630
Mailing Address:	4666 Faries Parkway, Decatur, Illinois 62526
General Source Phone Number:	1-812-853-2986
SIC Code:	5153
County Location:	Warrick
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) truck receiving facility, known as dump 1, constructed in 1975, with a maximum throughput of 15,000 bushels per hour, with particulate matter controlled by baghouse #1, rated at 40,000 acfm, exhausting to stack No. 1.
- (b) One (1) truck receiving facility, known as dump 2, constructed in 1980, with a maximum throughput of 30,000 bushels per hour, equipped with baffles for air pollution control.
- (c) One (1) truck receiving facility, known as dump 3, constructed in 1983, with a maximum throughput of 15,000 bushels per hour, with particulate matter controlled by baghouse #1, rated at 40,000 acfm, exhausting to stack No. 1.
- (d) One (1) truck loadout, known as loadout-dump 1, constructed in 1975, with a maximum throughput of 15,000 bushels per hour.
- (e) One (1) truck loadout, known as loadout-bin 9, constructed in 1992, with a maximum throughput of 5,000 bushels per hour.
- (f) One (1) truck loadout, known as loadout-bin 10, constructed in 1999, with a maximum throughput of 10,000 bushels per hour.
- (g) One (1) truck loadout, known as loadout-bin 11, constructed in 1999, with a maximum throughput of 10,000 bushels per hour.
- (h) One (1) grain cleaner, constructed in 2000, with a maximum throughput of 15,000 bushels per hour.
- (i) One (1) natural gas-fired column grain dryer, constructed in 2003, rated at 32 MMBtu per

hour, with a maximum throughput of 3,000 bushels per hour.

- (j) One (1) barge belt, constructed in 1975, with a maximum throughput of 30,000 bushels per hour.
- (k) Internal handling operations, constructed in 1975, are controlled by conveyors which are completely enclosed except at the river belt. In addition internal handling operations are controlled by baghouse #1 which is attached to truck dumps 1 & 3 and both of the truck legs.
- (l) Three (3) storage bins, known as bins 1, 2 and 3, constructed in 1975, each with a storage capacity of 20,000 bushels.
- (m) Two (2) storage bins, known as bins 4 and 5, constructed in 1975, each with a storage capacity of 100,000 bushels.
- (n) One (1) storage bin, known as bin 6, constructed in 1986, with a storage capacity of 1,000,000 bushels.
- (o) Three (3) storage bins, known as bins 7, 8 and 9, constructed in 1992, each with a storage capacity of 30,000 bushels.
- (p) Two (2) storage bins, known as bins 10 and 11, constructed in 1999, each with a storage capacity of 5,000 bushels.

SECTION B GENERAL CONDITIONS

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

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

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

-
- (a) This permit, M173-26638-00011, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Certification

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to M173-26638-00011 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 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.10 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.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11]

- (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.13 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.14 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.15 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.16 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.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) truck receiving facility, known as dump 1, constructed in 1975, with a maximum throughput of 15,000 bushels per hour, with particulate matter controlled by baghouse #1, rated at 40,000 acfm, exhausting to stack No. 1.
- (b) One (1) truck receiving facility, known as dump 2, constructed in 1980, with a maximum throughput of 30,000 bushels per hour, equipped with baffles for air pollution control.
- (c) One (1) truck receiving facility, known as dump 3, constructed in 1983, with a maximum throughput of 15,000 bushels per hour, with particulate matter controlled by baghouse #1, rated at 40,000 acfm, exhausting to stack No. 1.
- (d) One (1) truck loadout, known as loadout-dump 1, constructed in 1975, with a maximum throughput of 15,000 bushels per hour.
- (e) One (1) truck loadout, known as loadout-bin 9, constructed in 1992, with a maximum throughput of 5,000 bushels per hour.
- (f) One (1) truck loadout, known as loadout-bin 10, constructed in 1999, with a maximum throughput of 10,000 bushels per hour.
- (g) One (1) truck loadout, known as loadout-bin 11, constructed in 1999, with a maximum throughput of 10,000 bushels per hour.
- (h) One (1) grain cleaner, constructed in 2000, with a maximum throughput of 15,000 bushels per hour.
- (i) One (1) natural gas-fired column grain dryer, constructed in 2003, rated at 32 MMBtu per hour, with a maximum throughput of 3,000 bushels per hour.
- (j) One (1) barge belt, constructed in 1975, with a maximum throughput of 30,000 bushels per hour.
- (k) Internal handling operations, constructed in 1975, are controlled by conveyors which are completely enclosed except at the river belt. In addition internal handling operations are controlled by baghouse #1 which is attached to truck dumps 1 & 3 and both of the truck legs.
- (l) Three (3) storage bins, known as bins 1, 2 and 3, constructed in 1975, each with a storage capacity of 20,000 bushels.
- (m) Two (2) storage bins, known as bins 4 and 5, constructed in 1975, each with a storage capacity of 100,000 bushels.
- (n) One (1) storage bin, known as bin 6, constructed in 1986, with a storage capacity of 1,000,000 bushels.
- (o) Three (3) storage bins, known as bins 7, 8 and 9, constructed in 1992, each with a storage capacity of 30,000 bushels.

(p) Two (2) storage bins, known as bins 10 and 11, constructed in 1999, each with a storage capacity of 5,000 bushels.

(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 PSD Minor Limit [326 IAC 2-2]

- (a) PM from the two primary truck receiving facilities, dump 1 and dump 3, shall be limited to 0.158 pounds per ton of grain throughput, equivalent to 62.8 tons per year when operating at the maximum process weight rate of 797,538 tons per year.
- (b) PM from internal grain handling operations, consisting of conveyors, shall be limited to 0.0305 pounds per ton of grain throughput, equivalent to 24.325 tons per year when operating at the maximum process weight rate of 1,595,076 tons per year.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 month consecutive month period, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 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:

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

Emissions Unit	326 IAC 6-3 Limit (pounds per hour)
Dump 1	67.70
Dump 2	76.20
Dump 3	67.70
Loadout-dump 1	67.70
Loadout-bin 9	55.40
Loadout-bin 10	63.00
Loadout-bin 11	63.00
Grain cleaner	67.70
Internal handling operations	67.70
Column grain dryer	50.20
Barge belt	76.2

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 and its control device.

Compliance Determination Requirements

D.1.4 Particulate Control

- (a) In order to comply with Conditions D.1.1 and D.1.2 the baghouse for particulate control shall be in operation and control emissions from the truck receiving facilities known as dump 1 and dump 3 at all times that the truck receiving facilities are in operation.
- (b) In order to comply with Condition D.1.2, the baffles for particulate control shall be in operation and control emissions from the truck receiving facility known as dump 2 at all times that the truck receiving facility is in operation.
- (c) In order to comply with Condition D.1.1 and D.1.2, the baghouse for particulate control shall be in operation and control emissions from internal grain handling operations at all times that grain handling operations are in operation.
- (d) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.5 Visible Emissions Notations

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

D.1.6 Baghouse Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the baghouse #1 used in conjunction with the internal grain handling operations and truck receiving facilities at least once per day when the internal grain handling operations and truck receiving facilities are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.1 to 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit.

Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line.

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

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

D.1.8 Recordkeeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain monthly records of the grain throughput for the entire source.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the baghouse stack exhaust once per day.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain the following once per day records of the pressure drop during normal operation, and documentation of the dates vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Recordkeeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION

Source Name: ADM Grain Company
Source Address: 9521 W. State Road 662, Newburgh, Indiana 47630
Mailing Address: 4666 Faries Parkway, Decator, Illinois 62526
MSOP Permit No.: M173-26638-00011

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**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:	ADM Grain Company
Address:	9521 W. State Road 662
City:	Newburgh, Indiana 47630
Phone #:	1-812-853-2986
MSOP #:	M173-26638-00011

I hereby certify that ADM Grain Company is :

still in operation.

no longer in operation.

I hereby certify that ADM Grain Company is :

in compliance with the requirements of MSOP M173-26638-00011.

not in compliance with the requirements of MSOP M173-26638-00011.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the Technical Support Document (ATSD) for a
Minor Source Operating Permit (MSOP) Renewal**

Source Background and Description

Source Name:	ADM Grain Company
Source Location:	9521 W State Road 662, Newburgh, Indiana, 47630
County:	Warrick
SIC Code:	5153
Operation Permit No.:	M173-26638-00011
Permit Reviewer:	Sarah Conner, Ph. D.

On October 16, 2008, the Office of Air Quality (OAQ) had a notice published in the Boonville Standard, Boonville, Indiana, stating that ADM Grain Company had applied for a MSOP renewal to continue the operation of a stationary country grain elevator. The notice also stated that the OAQ proposed to issue a MSOP renewal 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

On November 10, 2008, ADM Grain Company submitted comments to IDEM, OAQ on the draft MSOP renewal.

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 comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

ADM Grain Company requested a revision to section D1.6 Baghouse Parametric Monitoring in the draft permit. The request that "the pressure drop across the baghouse is outside the normal range of 1.0 to 6.0 inches of water" be revised to a range of 0.1 to 3.0 inches of water.

Response to Comment 1:

OAQ Permits, in consultation with OAQ Compliance agrees with the recommended changes, since a range of 0.1 to 3.0 inches of water is acceptable. The permit has been revised as follows:

D.1.6 Baghouse Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the limestone transfer drop points at least once per day when the limestone handling is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of ~~4.0~~ **0.1** to **3.0** ~~6.0~~ inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

In section D.1.6 Baghouse Parametric Monitoring, IDEM received internal comments requesting that the language in this section "in conjunction with the limestone transfer drop points at least once per day when the limestone handling is in operation" be revised to the following:

D.1.6 Baghouse Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the ~~b~~Baghouses #1 used in conjunction with the ~~limestone transfer drop points~~ **internal grain handling operations and truck receiving facilities** at least once per day when the ~~limestone handling is~~ **internal grain handling operations and truck receiving facilities and are** in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of ~~4.0~~ **0.1 to 3.0** ~~6.0~~ inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, however, IDEM OAQ has decided to show corrections to the TDS below, with deleted language as ~~strikeouts~~ and new language **bolded**.

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

- (d) The potential to emit PM from Load-dump 1 is 38.7 pounds per hour. This facility will be **in** compliance without controls.
- (e) The potential to emit PM from Load-bin 9 is 12.9 pounds per hour. This facility will be **in** compliance without controls.
- (f) The potential to emit PM from Loadout-bin 10 is 25.8 pounds per hour. This facility will be **in** compliance without controls.
- (g) The potential to emit PM from Loadout-bin 11 is 25.8 pounds per hour. This facility will be **in** compliance without controls.
- (h) The potential to emit PM from the grain cleaner is 33.8 pounds per hour. This facility will be **in** compliance without controls.
- (j) The potential to emit PM from the column grain dryer is 19.8 pounds per hour. This facility will be **in** compliance without controls.
- (k) The potential to emit PM from the barge belt is 54.9 pounds per hour. This facility will be **in** compliance without controls.

IDEM Contact

- (a) Questions regarding this proposed MSOP Renewal can be directed to Sarah Conner, Ph. D. at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6555 or toll free at 1-800-451-6027 extension 4-6555.

- (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 Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	ADM Grain Company
Source Location:	9521 W State Road 662, Newburgh, Indiana, 47630
County:	Warrick
SIC Code:	5153
Permit Renewal No.:	M173-26638-00011
Permit Reviewer:	Sarah Conner, Ph. D.

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from ADM Grain Company relating to the operation of a stationary country grain elevator.

History

On June 10, 2008, ADM Grain Company submitted an application to the OAQ requesting to renew its operating permit. ADM Grain Company was issued an MSOP (M173-17164-00011) on September 3, 2003.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) truck receiving facility, known as dump 1, constructed in 1975, with a maximum throughput of 15,000 bushels per hour, with particulate matter controlled by baghouse #1, rated at 40,000 acfm, exhausting to stack No. 1.
- (b) One (1) truck receiving facility, known as dump 2, constructed in 1980, with a maximum throughput of 30,000 bushels per hour, equipped with baffles for air pollution control.
- (c) One (1) truck receiving facility, known as dump 3, constructed in 1983, with a maximum throughput of 15,000 bushels per hour, with particulate matter controlled by baghouse #1, rated at 40,000 acfm, exhausting to stack No. 1.
- (d) One (1) truck loadout, known as loadout-dump 1, constructed in 1975, with a maximum throughput of 15,000 bushels per hour.
- (e) One (1) truck loadout, known as loadout-bin 9, constructed in 1992, with a maximum throughput of 5,000 bushels per hour.
- (f) One (1) truck loadout, known as loadout-bin 10, constructed in 1999, with a maximum throughput of 10,000 bushels per hour.
- (g) One (1) truck loadout, known as loadout-bin 11, constructed in 1999, with a maximum throughput of 10,000 bushels per hour.
- (h) One (1) grain cleaner, constructed in 2000, with a maximum throughput of 15,000 bushels per hour.
- (i) One (1) natural gas-fired column grain dryer, constructed in 2003, rated at 32 MMBtu per hour, with a maximum throughput of 3,000 bushels per hour.

- (j) One (1) barge belt, constructed in 1975, with a maximum throughput of 30,000 bushels per hour.
- (k) Internal handling operations, constructed in 1975, consisting of conveyors, which are completely enclosed except at the river belt. In addition, internal handling operations are controlled by baghouse #1 that is attached to truck dumps 1 & 3 and both of the truck legs.
- (l) Three (3) storage bins, known as bins 1, 2 and 3, constructed in 1975, each with a storage capacity of 20,000 bushels.
- (m) Two (2) storage bins, known as bins 4 and 5, constructed in 1975, each with a storage capacity of 100,000 bushels.
- (n) One (1) storage bin, known as bin 6, constructed in 1986, with a storage capacity of 1,000,000 bushels.
- (o) Three (3) storage bins, known as bins 7, 8 and 9, constructed in 1992, each with a storage capacity of 30,000 bushels.
- (p) Two (2) storage bins, known as bins 10 and 11, constructed in 1999, each with a storage capacity of 5,000 bushels.

Existing Approvals

Since the issuance of the MSOP No. M173-17164-00011 on September 3, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 173-21753-00011 issued on September 27, 2005, and
- (b) Administrative Amendment No. 173-24960-00011 issued on July 18, 2007.

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

The following terms and conditions from previous approvals have been revised in this MSOP Renewal:

- (a) PSD minor limit

The PSD minor limit in Condition D.1.1 for internal grain handling operations has been revised to take into account that the grain is handled twice, which doubles the maximum process weight from 797,538 to 1,598,076. A new PSD minor limit for PM from internal grain handling operations has been added to Condition D.1.1 to limit PM emissions to 0.0305 pounds per ton of grain throughput. This will keep the total PM less than 250 tons per year when operating at the maximum process weight rate of 1,598,076 tons of grain per year.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Warrick County.

Pollutant	Designation
SO ₂	Cannot be classified.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective January 30, 2006, for the Evansville area, including Warrick County, 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. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and 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. Warrick County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5

U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Warrick County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM2.5 promulgated on May 8th, 2008, and effective on July 15th 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

- (c) **Other Criteria Pollutants**
Warrick County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, and there are no applicable New Source Performance Standards that were in effect on August 7, 1980. The source is not subject to 40 CFR Part 60, Subpart DD, Standards of Performance for Grain Elevators, because it is a Grain, Terminal Elevator with a permanent storage capacity less than 2.5 million U.S. bushels. Therefore, the fugitive particulate matter (PM) emissions are not counted toward determination of PSD applicability.
- (e) The National Grain and Feed Association has obtained a ruling from the U.S. EPA regarding fugitive emissions from grain elevators. In a letter from Edward J. Lillis, Chief of the U.S. EPA Permit Programs Branch, dated October 14, 1994, to Thomas C. O'Conner, Director of Technical Service of the Association, the Agency stated that grain elevators below the applicable facility size as defined in 40 CFR Part 60, Subpart DD need not consider fugitive emissions when determining major source status.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	282.60
PM ₁₀	95.29
PM _{2.5}	17.10
SO ₂	0.08
VOC	0.77
CO	11.77
NO _x	14.02

HAPs	tons/year
Butane	0.03
Ethane	0.05
Formaldehyde	0.01
Hexane	0.25
Pentane	0.04
Propane	0.03
All other single HAPs	negligible
TOTAL	0.42

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

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

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit (tons/year)							
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	HAPs
Receiving (Truck)	63.0*	23.5	4.0	-	-	-	-	-
Internal Handling	24.3*	27.1	4.6	-	-	-	-	-
Cleaning	29.9	7.6	1.3	-	-	-	-	-
Drying	87.7	21.9	3.7	-	-	-	-	-
Storage Bin Vents	10.0	2.5	0.4	-	-	-	-	-
Shipping (Truck)	34.3	11.6	2.0	-	-	-	-	-
Combustion (Dryer)	0.27	1.1	1.1	0.08	0.8	11.8	14.0	0.42
Total Emissions	249.5	95.3	17.1	0.08	0.8	11.8	14.0	0.42

*PM emissions from the source are limited pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than or limited to less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Emission Offset and Nonattainment NSR because the emissions of the nonattainment pollutant, PM_{2.5}, are less than one hundred (<100) tons per year.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD, are not included in the permit for the country grain elevator because it has a permanent storage capacity less than 2.5 million U.S. bushels. The maximum capacity of the source is 1.36 million U.S. bushels.

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

State Rule Applicability - Entire Source

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

Construction of some emission units at the source commenced prior to August 7, 1977. However, additional units were added after August 7, 1977. The addition of these units increased the uncontrolled emissions of particulate matter (PM) from the entire source to 282.6 tons per year, which is greater than the 250 tons per year PSD threshold. In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following:

- (a) PM from the two primary truck receiving facilities, dump 1 and dump 3, shall be limited to 0.158 pounds per ton of grain throughput, equivalent to 62.8 tons per year when operating at the maximum process weight rate of 797,538 tons per year.
- (b) PM from internal grain handling operations, consisting of conveyors, shall be limited to 0.0305 pounds per ton of grain throughput, equivalent to 24.325 tons per year when operating at the maximum process weight rate of 1,595,076 tons per year.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 month consecutive month period, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

326 IAC 2-3 (Emission Offset)

The source is located in Warrick County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-3, Emission Offset.

326 IAC 2-6 (Emission Reporting)

This source is located in Warrick County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

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

The maximum allowable particulate emission from each process used at the grain elevator shall be limited by the following (assuming corn with a bulk density of 60 pounds per bushel):

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

Emissions Unit	326 IAC 6-3 Limit (pounds per hour)
Dump 1	67.70
Dump 2	76.20
Dump 3	67.70
Loadout-dump 1	67.70
Loadout-bin 9	55.40
Loadout-bin 10	63.00
Loadout-bin 11	63.00
Grain cleaner	67.70
Internal handling operations	67.70
Column grain dryer	50.20
Barge belt	76.2

- (a) The potential to emit PM from dump 1 is 81 pounds per hour. Baghouse #1 must be in operation and control PM emissions at all times dump 1 is in operation in order to comply with this limit.
- (b) The potential to emit PM from dump 2 is 162 pounds per hour. The baffles shall be in operation and control PM emissions at all times dump 2 is in operation in order to comply with this limit.
- (c) The potential to emit PM from dump 3 is 81 pounds per hour. Baghouse #1 must be in operation and control PM emissions at all times dump 1 is in operation in order to comply with this limit.
- (d) The potential to emit PM from Load-dump 1 is 38.7 pounds per hour. This facility will be compliance without controls.
- (e) The potential to emit PM from Load-bin 9 is 12.9 pounds per hour. This facility will be compliance without controls.
- (f) The potential to emit PM from Loadout-bin 10 is 25.8 pounds per hour. This facility will be compliance without controls.
- (g) The potential to emit PM from Loadout-bin 11 is 25.8 pounds per hour. This facility will be compliance without controls.
- (h) The potential to emit PM from the grain cleaner is 33.8 pounds per hour. This facility will be compliance without controls.
- (i) The potential to emit PM from the internal handling operations is 27.45 pounds per hour. This facility will be compliance without controls under 326 IAC 6-3-2; however, Baghouse #1 must be in operation and control PM emission at all times internal handling is in operation in order to comply with 326 IAC 2-2.
- (j) The potential to emit PM from the column grain dryer is 19.8 pounds per hour. This facility will be compliance without controls.
- (k) The potential to emit PM from the barge belt is 54.9 pounds per hour. This facility will be compliance without controls.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is subject to the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because this source did not receive all the necessary construction approvals before 1985 and has the potential to emit greater than twenty-five (25) tons per year of fugitive particulate matter. Fugitive particulate emissions from the unpaved and paved roads are controlled by spraying with water on an as needed basis.

Compliance Determination and Monitoring Requirements

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

- (a) Baghouse #1 controlling particulate emissions from dump 1, dump 3, and internal handling, has applicable compliance determination conditions as specified below:
 - (1) daily visible emission notations
 - (2) daily pressure drop readings

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse #1	Water Pressure Drop	Daily	1.0 to 6.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

Recommendation

The staff recommends to the Commissioner that the MSOP Renewal M173-26638-00011 be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on June 10, 2008. Additional information was received on August 14, 2008.

Conclusion

The operation of this stationary country grain elevator shall be subject to the conditions of the attached MSOP Renewal No. M173-26638-00011.

SUMMARY OF POTENTIAL EMISSIONS FROM ADM GRAIN COMPANY

Company Name: ADM Grain Company
Address: 9521 W State Road 662, Newburgh, Indiana, 47630
MSOP: M173-26638-00011
Reviewer: Sarah Conner, Ph. D.
Date: 9/3/2008

	Particulate			Sulfur	VOC	Carbon	Nitrogen	HAPS
	Matter (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	Dioxide (tons/yr)	(tons/yr)	Monoxide (tons/yr)	Oxides (tons/yr)	
Receiving (Straight Truck)	63.0*	23.5	4.5	-	-	-	-	-
Internal Handling (grain handling)	24.3*	27.1	4.6	-	-	-	-	-
Cleaning	29.9	7.6	1.3	-	-	-	-	-
Drying (column)	87.7	21.9	3.7	-	-	-	-	-
Storage Bin Vents	10.0	2.5	0.4	-	-	-	-	-
Shipping (Truck, unspecified)	34.3	11.6	2.0	-	-	-	-	-
Combustion (Dryer)	0.27	1.10	1.10	0.08	0.80	11.80	14.00	0.42
TERMINAL WIDE TOTALS	249.50	95.30	17.60	0.08	0.80	11.80	14.00	0.42

*PM emissions from the source are limited pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

Maximum single HAP emission (Hexane) 0.25 tons per year

Maximum combined HAP Emissions from entire source 0.42 tons per year

Additional HAP information is found on page 4 of the calculations

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

Source Name:	ADM Grain Company	SIC Code:	5153
Source Location:	9521 W State Road 662, Newburgh, Indiana, 47630	Permit Renewal No.:	M173-26638-00011
County:	Warrick	Permit Reviewer:	Sarah Conner, Ph. D.

Heat Input Capacity	Potential Throughput
MMBtu/hr	MMCF/yr

32.000

280.32

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10**	PM2.5***	SO2	NOx	VOC	CO
	1.90	7.60	7.60	0.600	100 ****see below	5.50	84.0
Potential Emission in tons/yr	0.266	1.065	1.065	0.084	14.016	0.771	11.773
Total uncontrolled PM, PM10, PM2.5	282.861	96.360	18.161				

*PM emission factor is filterable PM only.

**PM10 emission factor is filterable and condensable

***PM2.5 emission factor is filterable and condensable

****Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 3 for HAPs emissions calculations.

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

Source Name:	ADM Grain Company	SIC Code:	5153
Source Location:	9521 W State Road 662, Newburgh, Indiana, 47630	Permit Renewal No.:	M173-26638-00011
County:	Warrick	Permit Reviewer:	Sarah Conner, Ph. D.

HAPs - Organics

	Benzene	Butane	Dichloro- benzene	Ethane	Formaldehyde	Hexane	Pentane	Propane	Toluene
Emission Factor in lb/MMcf	0.002	2.1	0.001	3.1	0.075	1.80	2.600	1.600	0.003
Potential Emission in tons/yr	0.00029	0.0336	0.000168	0.0496	0.0105	0.252	0.0416	0.0256	0.000477

HAPs - Metals

	Lead	Barium	Cadmium	Chromium	Molybdenum	Nickel	Vanadium	Zinc	Total HAPs
Emission Factor in lb/MMcf	0.0005	0.0044	0.001	0.001	0.0011	0.002	0.002	0.029	
Potential Emission in tons/yr	0.000070	0.0000704	0.000154	0.000196	0.0000176	0.00029	0.00004	0.000464	0.415

Methodology is the same as page 2.

The organic and metal HAPs emission factors that are higher than 0.99 E-03 are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.