



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: March 18, 2009

RE: ADM Grain Company / 097 - 27052 - 00028

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
1901 South Sherman Drive
Indianapolis, Indiana 46204

(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.

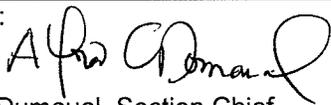
Operation Permit No.: M097-27052-00028	
Issued by:  Alfred C. Dumauval, Section Chief Office of Air Quality	Issuance Date: March 18, 2009 Expiration Date: March 18, 2019

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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 Grain Elevator.

Source Address:	1901 South Sherman Drive, Indianapolis, Indiana 46204
Mailing Address:	1901 South Sherman Drive, Indianapolis, Indiana 46204
General Source Phone Number:	317-784-2200
SIC Code:	5153
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two hundred eighteen (218) storage bins, with a combined, maximum capacity of less than twelve (12) million bushels, using no control, and exhausting to the atmosphere. The bins are separated into four (4) groups identified as the "65 House", installed in 1965 and 1966, containing bins identified as 326 through 354, along with 413 through 431, the "77 House", installed in 1977, containing bins identified as 501 through 509, the "57 House", installed in 1957 and 1958, containing bins identified as 31 through 60, 61a, 61b, 62a, 62b, 63, 64, 65a, 65b, 71a, 71b, 72a, 72b, 73a, 73b, 81 through 98, 151 through 186, and 251 through 265, and the "Bean House", containing bins identified as 301 through 324, and 410 through 413.
- (b) One (1) natural gas column dryer, installed in 1996, with a maximum heat input of 28 million Btu per hour (MMBtu/hr), and a maximum grain throughput of 75 tons per hour, using no control, and exhausting to the atmosphere. Under 40 CFR 60.300, the natural gas dryer is considered an affected facility. [40 CFR Part 60, Subpart DD]
- (c) Two (2) legs, identified as Dry Leg, and Wet Leg, installed in 1996, serving the dryer, each with a maximum capacity of 224 tons per hour, using no control and exhausting to the atmosphere. Under 40 CFR 60.300, the legs are considered an affected facility. [40 CFR Part 60, Subpart DD]
- (d) One (1) twin truck dump, with a maximum capacity of 350 tons per hour, installed in 1965 and 1966, using a baghouse, identified as Baghouse #8, as particulate control, and exhausting to stack 8.
- (e) One (1) rail loadout, identified as South, installed in 1957 and 1958, with maximum capacity of 336 tons per hour, using no control and exhausting to the atmosphere.

- (f) One (1) rail loadout, identified as North, installed in 1957 and 1958, and upgraded in 1988, with maximum capacity of 1100 tons per hour, using a baghouse, identified as Baghouse #9, as particulate control, and exhausting to the atmosphere.
- (g) Two (2) rail receiving operations, identified as North and South, installed in 1957 and 1958, each with a maximum capacity of 270 tons per hour. The North rail receiving operation uses no control and exhausts to the atmosphere, and the South rail receiving operation uses a baghouse, identified as Baghouse #5, as particulate control, and exhausts to stack 5.
- (h) Internal transfer operations, serving the "65 House", installed in 1965 and 1966, with a maximum capacity of 336 tons per hour, using baghouses, identified as Baghouse #6 and Baghouse #10, as particulate control, and exhausting to stack 6 and stack 10.
- (i) Fourteen (14) truck loadout spouts, serving the "65 house", installed in 1965 and 1966, each with a maximum capacity of 280 tons per hour, using no control, and exhausting to the atmosphere.
- (j) Two (2) shipping legs, identified as Leg 7, Leg 8, installed in 1965 and 1966, serving the "65 House", each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (k) One (1) shipping leg, identified as Leg C1, installed in 1977, serving the "65 House", with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (l) Internal transfer operations, serving the "77 House", installed in 1977, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #1, as particulate control, and exhausting to stack 1.
- (m) Internal transfer operations, serving the "57 House", installed in 1957 and 1958, with a maximum capacity of 336 tons per hour, using baghouses and cyclones, identified as Baghouse #7, Baghouse #9, North Garner Cyclone, and South Garner Cyclone as particulate control, and exhausting to stack 7.
- (n) Five (5) shipping legs, installed in 1957 and 1958, serving the "57 House", identified as Legs 1 through 5, each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (o) One (1) shipping legs, installed in 1977, serving the "57 House", identified as F1 Jack Leg, with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (p) Unpaved and paved roads with public access.

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, M097-27052-00028, 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

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

B.5 Severability

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 and Enforcement 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 M097-27052-00028 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 one hundred twenty (120) 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 Administrative and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) 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 and OES on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 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 Administrative and Support Section, 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 Administrative and Support Section, 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 due within thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (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 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.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

C.6 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 January 20, 2009. The plan is included as Attachment B.

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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.9 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

Corrective Actions and Response Steps

C.14 Response to Excursions or Exceedances

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

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

C.15 Emergency Reduction Plan [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3].

C.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 or ninety (90) days of initial start-up, whichever is later.

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 and Enforcement Branch, 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) Two hundred eighteen (218) storage bins, with a combined, maximum capacity of less than twelve (12) million bushels, using no control, and exhausting to the atmosphere. The bins are separated into four (4) groups identified as the "65 House", installed in 1965 and 1966, containing bins identified as 326 through 354, along with 413 through 431, the "77 House", installed in 1977, containing bins identified as 501 through 509, the "57 House", installed in 1957 and 1958, containing bins identified as 31 through 60, 61a, 61b, 62a, 62b, 63, 64, 65a, 65b, 71a, 71b, 72a, 72b, 73a, 73b, 81 through 98, 151 through 186, and 251 through 265, and the "Bean House", containing bins identified as 301 through 324, and 410 through 413.
- (b) One (1) natural gas column dryer, installed in 1996, with a maximum heat input of 28 million Btu per hour (MMBtu/hr), and a maximum grain throughput of 75 tons per hour, using no control, and exhausting to the atmosphere.
- (c) Two (2) legs, identified as Dry Leg, and Wet Leg, installed in 1996, serving the dryer, each with a maximum capacity of 224 tons per hour, using no control and exhausting to the atmosphere.
- (d) One (1) twin truck dump, with a maximum capacity of 350 tons per hour, installed in 1965 and 1966, using a baghouse, identified as Baghouse #8, as particulate control, and exhausting to stack 8.
- (e) One (1) rail loadout, identified as South, installed in 1957 and 1958, with maximum capacity of 336 tons per hour, using no control and exhausting to the atmosphere.
- (f) One (1) rail loadout, identified as North, installed in 1957 and 1958, and upgraded in 1988, with maximum capacity of 1100 tons per hour, using a baghouse, identified as Baghouse #9, as particulate control, and exhausting to the atmosphere.
- (g) Two (2) rail receiving operations, identified as North and South, installed in 1957 and 1958, each with a maximum capacity of 270 tons per hour. The North rail receiving operation uses no control and exhausts to the atmosphere, and the South rail receiving operation uses a baghouse, identified as Baghouse #5, as particulate control, and exhausts to stack 5.
- (h) Internal transfer operations, serving the "65 House", installed in 1965 and 1966, with a maximum capacity of 336 tons per hour, using baghouses, identified as Baghouse #6 and Baghouse #10, as particulate control, and exhausting to stack 6 and stack 10.
- (i) Fourteen (14) truck loadout spouts, serving the "65 house", installed in 1965 and 1966, each with a maximum capacity of 280 tons per hour, using no control, and exhausting to the atmosphere.
- (j) Two (2) shipping legs, identified as Leg 7, Leg 8, installed in 1965 and 1966, serving the "65 House", each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.

- (k) One (1) shipping leg, identified as Leg C1, installed in 1977, serving the "65 House", with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (l) Internal transfer operations, serving the "77 House", installed in 1977, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #1, as particulate control, and exhausting to stack 1.
- (n) Internal transfer operations, serving the "57 House", installed in 1957 and 1958, with a maximum capacity of 336 tons per hour, using baghouses and cyclones, identified as Baghouse #7, Baghouse #9, North Garner Cyclone, and South Garner Cyclone as particulate control, and exhausting to stack 7.
- (n) Five (5) shipping legs, installed in 1957 and 1958, serving the "57 House", identified as Legs 1 through 5, each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.

(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

D.1.1 Particulate Emission Limitations [326 IAC 6.5-1-2]

- (a) Pursuant to 326 IAC 6.5-1-2, grain elevators, listed below, shall be limited to particulate matter emissions of no greater than three-hundredths (0.03) grain per dscf.

Emissions Unit
Truck Dump
North rail loadout
South rail loadout
North rail receiving
South rail receiving
"65" internal transfer
Truck Loadouts
Leg 7
Leg 8
Leg C1
"77" internal transfer
"57" internal transfer

Leg 1
Leg 2
Leg 3
Leg 4
Leg 5
"57" shipping leg

- (b) Pursuant to 326 IAC 6.5-1-2, all grain elevators shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:
- (1) Housekeeping practices shall be conducted as follows:
- (A) Areas to be swept and maintained shall include at a minimum:
- (i) general grounds, yard, and other open areas;
- (ii) floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations; and;
- (iii) grain driers with respect to accumulated particulate matter.
- (B) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
- (C) Dust from driveways, access roads, and other areas of travel shall be controlled.
- (D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day=s operation.
- (2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
- (A) Malfunctions.
- (B) Breakdowns.
- (C) Improper adjustment.
- (D) Operating above the rated or designed capacity.
- (E) Not following designed operating specifications.
- (F) Lack of good preventive maintenance care.
- (G) Lack of critical and proper spare replacement parts on hand.

- (H) Lack of properly trained and experienced personnel.
- (3) Emissions from the affected areas, operations equipment, and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

D.1.2 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 the emission units and controls.

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with D.1.1, the baghouses, identified as Baghouse #1, Baghouse #6, Baghouse #7, Baghouse #8, Baghouse #9, and Baghouse #10 for particulate control shall be in operation and control emissions from the affected facilities at all times these facilities are in operation.

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

D.1.4 Visible Emissions Notations

- (a) Visible emission notations of the stack exhausts for Baghouse #1, Baghouse #6, Baghouse #7, Baghouse #8, Baghouse #9, and Baghouse #10 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.1.5 Parametric Monitoring

The Permittee shall record the pressure drop across Baghouse #1, Baghouse #6, Baghouse #7, Baghouse #8, Baghouse #9, and Baghouse #10 used in conjunction with the affected facilities, at least once per shift when the affected facilities are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.6 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse 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.1.7 Record Keeping Requirement

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the stack exhausts. 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 process did not operate that day).
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records once per day of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) natural gas column dryer, installed in 1996, with a maximum heat input of 28 million Btu per hour (MMBtu/hr), and a maximum grain throughput of 75 tons per hour, using no control, and exhausting to the atmosphere.
- (c) Two (2) legs, identified as Dry Leg, and Wet Leg, installed in 1996, serving the dryer, each with a maximum capacity of 224 tons per hour, using no control and exhausting to the atmosphere.

(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

E.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the affected facilities described in this section except when otherwise specified in 40 CFR 60, Subpart DD.

Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart DD]

The permittee shall comply with the following provisions of 40 CFR 60, Subpart DD (included as Attachment A of this permit), for the natural gas dryer and the two (2) legs, identified as Dry Leg and Wet Leg:

- (1) 40 CFR 60.300(a)
- (2) 40 CFR 60.300(b)
- (3) 40 CFR 60.302(a)(1)
- (4) 40 CFR 60.302(a)(2)
- (5) 40 CFR 60.302(b)(1)
- (6) 40 CFR 60.302(b)(2)
- (7) 40 CFR 60.302(c)(1)
- (8) 40 CFR 60.302(c)(2)
- (9) 40 CFR 60.302(c)(3)
- (10) 40 CFR 60.302(c)(4)

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

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: ADM Grain Company
Source Address: 1901 South Sherman Drive, Indianapolis, Indiana 46204
Mailing Address: 1901 South Sherman Drive, Indianapolis, Indiana 46204
MSOP No.: M097-27052-00028

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 AND ENFORCEMENT 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:	1901 South Sherman Drive
City:	Indianapolis, Indiana 46204
Phone #:	317-784-2200
MSOP #:	M097-27052-00028

I hereby certify that ADM Grain Company is :

still in operation.

I hereby certify that ADM Grain Company is :

no longer in operation.

in compliance with the requirements of MSOP M097-27052-00028.

not in compliance with the requirements of MSOP M097-27052-00028.

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 Fax Number: (317) 327-2274

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

Subpart DD—Standards of Performance for Grain Elevators

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

§ 60.300 Applicability and designation of affected facility.

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

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

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

§ 60.301 Definitions.

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

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

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

(c) *Grain terminal elevator* means any grain elevator which has a permanent storage capacity of more than 88,100 m³ (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots.

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

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

(f) *Grain storage elevator* means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 35,200 m³ (ca. 1 million bushels).

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

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

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

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

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

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

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

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

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

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

§ 60.302 Standard for particulate matter.

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

(1) Column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch).

(2) Rack dryer in which exhaust gases pass through a screen filter coarser than 50 mesh.

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

(1) Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf).

(2) Exhibits greater than 0 percent opacity.

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

(1) Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.

(2) Any grain handling operation which exhibits greater than 0 percent opacity.

(3) Any truck loading station which exhibits greater than 10 percent opacity.

(4) Any barge or ship loading station which exhibits greater than 20 percent opacity.

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

(1) The unloading leg shall be enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device shall be maintained on both sides of the leg and the grain receiving hopper.

(2) The total rate of air ventilated shall be at least 32.1 actual cubic meters per cubic meter of grain handling capacity (ca. 40 ft³ /bu).

(3) Rather than meet the requirements of paragraphs (d)(1) and (2) of this section the owner or operator may use other methods of emission control if it is demonstrated to the Administrator's satisfaction that they would reduce emissions of particulate matter to the same level or less.

Attachment B

ADM Grain Company
1901 S. Sherman Drive
Indianapolis, IN 46203

FUGITIVE DUST CONTROL PLAN

The fugitive dust control plan components listed below will be implemented by Wendall Carroll, Superintendent at our Indianapolis, IN facility at the address listed above. The components are outlined below:

The Indianapolis Grain Elevator receives grain by truck and rail and is mostly shipped out by railcars directly to ADM's customers. A small portion of our grain is shipped out by truck. This grain elevator receives approximately 15 million bushels of grain a year. Our complete list of processes and emission points are attached; along with a map showing our facility in detail.

Our fugitive emissions primarily come from our unpaved haul roads. We currently see approximately 62 trucks a day. Each truck has a maximum weight of 80,000 lbs or 40 tons. The fugitive particulate matter (dust) that results from our unpaved haul roads is what needs to be addressed. These roads are used more frequently during our harvest season, which is late September running through the later part of November. The primary truck route through the facility is asphalt.

Currently the facility treats the haul roads with emulsified asphalt normally once a year or as needed. The location superintendent determines this frequency once he sees the dust becoming a problem then the emulsified is added more often than once a year.

The facility has not made a practice of documenting the frequency of the application, but going forward with the creation of this plan, will, indeed document the amount of emulsified asphalt used and the frequency of the application. These records will continue to be maintained and presented upon request of the commissioner and shall be retained for a period of three (3) years.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	ADM Grain Company
Source Location:	1901 South Sherman Drive Indianapolis, IN 46204
County:	Marion
SIC Code:	5153
Permit Renewal No.:	M097-27052-00028
Permit Reviewer:	Adam Estes

On February 12, 2009, the Office of Air Quality (OAQ) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Marathon Petroleum Company LLC - Indianapolis Terminal had proposed to renew a Minor Source Operating Permit (MSOP) to operate of a stationary grain elevator. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAQ has decided to make the following changes to the MSOP Renewal. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has published for public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Bolded language has been added and the language with ~~strikeout~~ has been deleted.

The changes to the MSOP Renewal are as follows:

Change 1

Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch.

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

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

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

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

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County:	Marion
SIC Code:	5153
Permit Renewal No.:	M097-27052-00028
Permit Reviewer:	Adam Estes

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

History

On September 30, 2008, ADM Grain Company submitted an application to the OAQ and OES requesting to renew its operating permit. ADM Grain Company was issued an MSOP, M097-7963-00028 on December 29, 2003.

Permitted Emission Units and Pollution Control Equipment

- (a) Two hundred eighteen (218) storage bins, with a combined, maximum capacity of less than twelve (12) million bushels, using no control, and exhausting to the atmosphere. The bins are separated into four (4) groups identified as the "65 House", installed in 1965 and 1966, containing bins identified as 326 through 354, along with 413 through 431, the "77 House", installed in 1977, containing bins identified as 501 through 509, the "57 House", installed in 1957 and 1958, containing bins identified as 31 through 60, 61a, 61b, 62a, 62b, 63, 64, 65a, 65b, 71a, 71b, 72a, 72b, 73a, 73b, 81 through 98, 151 through 186, and 251 through 265, and the "Bean House", containing bins identified as 301 through 324, and 410 through 413.
- (b) One (1) natural gas column dryer, installed in 1996, with a maximum heat input of 28 million Btu per hour (MMBtu/hr), and a maximum grain throughput of 75 tons per hour, using no control, and exhausting to the atmosphere. Under 40 CFR 60.300, the natural gas dryer is considered an affected facility. [40 CFR Part 60, Subpart DD]
- (c) Two (2) legs, identified as Dry Leg, and Wet Leg, installed in 1996, serving the dryer, each with a maximum capacity of 224 tons per hour, using no control and exhausting to the atmosphere. Under 40 CFR 60.300, the legs are considered an affected facility. [40 CFR Part 60, Subpart DD]
- (d) One (1) twin truck dump, with a maximum capacity of 350 tons per hour, installed in 1965 and 1966, using a baghouse, identified as Baghouse #8, as particulate control, and exhausting to stack 8.
- (e) One (1) rail loadout, identified as South, installed in 1957 and 1958, with maximum capacity of 336 tons per hour, using no control and exhausting to the atmosphere.
- (f) One (1) rail loadout, identified as North, installed in 1957 and 1958, and upgraded in 1988, with maximum capacity of 1100 tons per hour, using a baghouse, identified as Baghouse #9, as particulate control, and exhausting to the atmosphere.
- (g) Two (2) rail receiving operations, identified as North and South, installed in 1957 and 1958, each with a maximum capacity of 270 tons per hour. The North rail receiving

- operation uses no control and exhausts to the atmosphere, and the South rail receiving operation uses a baghouse, identified as Baghouse #5, as particulate control, and exhausts to stack 5.
- (h) Internal transfer operations, serving the "65 House", installed in 1965 and 1966, with a maximum capacity of 336 tons per hour, using baghouses, identified as Baghouse #6 and Baghouse #10, as particulate control, and exhausting to stack 6 and stack 10.
 - (i) Fourteen (14) truck loadout spouts, serving the "65 house", installed in 1965 and 1966, each with a maximum capacity of 280 tons per hour, using no control, and exhausting to the atmosphere.
 - (j) Two (2) shipping legs, identified as Leg 7, Leg 8, installed in 1965 and 1966, serving the "65 House", each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
 - (k) One (1) shipping leg, identified as Leg C1, installed in 1977, serving the "65 House", with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
 - (l) Internal transfer operations, serving the "77 House", installed in 1977, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #1, as particulate control, and exhausting to stack 1.
 - (m) Internal transfer operations, serving the "57 House", installed in 1957 and 1958, with a maximum capacity of 336 tons per hour, using baghouses and cyclones, identified as Baghouse #7, Baghouse #9, North Garner Cyclone, and South Garner Cyclone as particulate control, and exhausting to stack 7.
 - (n) Five (5) shipping legs, installed in 1957 and 1958, serving the "57 House", identified as Legs 1 through 5, each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
 - (o) One (1) shipping legs, installed in 1977, serving the "57 House", identified as F1 Jack Leg, with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
 - (p) Unpaved and paved roads with public access.

Existing Approvals

Since the issuance of the MSOP (M097-07963-00028) on December 29, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) First Notice Only Change No. (097-18613) issued on January 27, 2004; and
- (b) Second Notice Only Change No. (097-18861) issued on April 15, 2004; and
- (c) Third Notice Only Change No. (097-19593) issued on October 1, 2004; and
- (d) Fourth Notice Only Change No. (097-22409) issued on February 14, 2006; and
- (e) Fifth Notice Only Change No. (097-23365) issued on August 3, 2006; and
- (f) Sixth Notice Only Change No. (097-23536) issued on September 12, 2006.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM10	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic Nonattainment effective April 5, 2005 for PM2.5.	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On 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.
- (3) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for

ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions, and the effective date of these rules was July 15, 2008. Therefore, direct PM_{2.5} 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**
Marion County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) **Fugitive Emissions**
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, however, there is an applicable New Source Performance Standard that was in effect on August 7, 1980, therefore fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of 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

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Nonattainment NSR because PM_{2.5} and SO₂ emissions are less than 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) The natural gas grain dryer, the Wet Leg, and the Dry Leg are subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR § 60.300, Subpart DD), because these facilities were installed or modified at a grain terminal elevator with a permanent storage capacity of more than 2.5 million U.S. bushels that is not located at animal food manufacturer, pet food manufacturer, cereal manufacturer, brewery, or livestock feedlot, after August 3, 1978, and these facilities are included in the affected facilities listed in 40 CFR §60.300(a). Pursuant to this rule:

The natural gas grain dryer, the Wet Leg, and the Dry Leg are subject to the following portions of Subpart DD.

- (1) 40 CFR 60.300
 - (2) 40 CFR 60.301
 - (3) 40 CFR 60.302 (a)
 - (4) 40 CFR 60.302 (b)
 - (5) 40 CFR 60.302 (c)
 - (6) 40 CFR 60.303
 - (7) 40 CFR 60.304
- (b) Although the rail loadout, identified as North, was modified at such a grain terminal elevator after August 3, 1978, this rule does not apply, because, pursuant to 40 CFR §60.304(b)(1), this rule does not apply to the addition of gravity loadout spouts to existing grain storage or grain transfer bins.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-1.1-5 (Nonattainment New Source Review)

This source is not major under nonattainment NSR because it has the potential to emit less than 100 tons of PM10 (as a surrogate for PM2.5). Therefore, the Nonattainment New Source Review requirements are not applicable.

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

This source is not a major source. This source not one (1) of the twenty-eight (28) listed source categories. The potential to emit each criteria pollutant from the entire source is less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) are not applicable.

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

This source will emit less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs, and construction occurred before July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Marion 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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4-1, 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 (Fugitive Dust Emissions).

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

Pursuant to 326 IAC 6-5, the source's fugitive dust is greater than 25 tons therefore 326 IAC 6-5 applies (See pages 5-6 of Appendix A). The Source's fugitive dust plan will be included as Attachment B of the MSOP renewal.

State Rule Applicability – Individual Facilities

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 6-2-4, the natural gas dryer is not subject to this rule because the more stringent limitations set by 326 IAC 12, New Source Performance Standard (NSPS), 40 CFR 60.304, Subpart DD, as shown on page 5 of Appendix A.

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

Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with the potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour of PM shall be exempt from 326 IAC 6-3. Emission units Dry Leg, Wet Leg, rail receiving operations, House 57, House 65, House 77, Leg 1,2,3,4,5,7,8, Leg C1, and "57" shipping leg each have potential PM emissions less than 0.551 (See 6.5-1-2 below). Therefore, 326 IAC 6-3 does not apply.

326 IAC 6.5-1-2 (Particulate Emission Limitations)

- (a) Pursuant to 6.5-1-1(c), the natural gas grain dryer is not subject to this rule because the more stringent limitations set by 326 IAC 12, New Source Performance Standard (NSPS), 40 CFR 60.300 through 60.304, Subpart DD, apply, as shown on page 5 of Appendix A.
- (b) 326 IAC 6.5-1-2 applies to the Wet Leg, the Dry Leg, the twin truck dump, the South rail loadout, the North rail loadout, the North and South rail receiving operations, the internal transfer operations, serving the "65 House", the truck loadout sprouts, Leg 7, Leg 8, Leg C1, internal transfer operations, serving the "77 House", internal transfer operations, serving the "57 House", five (5) shipping legs, serving the "57 House", and one (1) shipping leg and serving the "57 House" because the source is not specifically listed in Section 6 of this rule, but has the potential to emit one hundred (100) tons or more of particulate matter per year.
 - (1) 326 IAC 6.5-1-2(d)(1) applies to the twin truck dump, the South rail loadout, the North rail loadout, the North and South rail receiving operations, the internal transfer operations, serving the "65 House", the truck loadout sprouts, Leg 7, Leg 8, internal transfer operations, serving the "57 House", and five (5) shipping legs, serving the "57 House" because construction or modification began prior to January 13, 1977, and they are located at a grain terminal elevator that has a permanent storage capacity of two million five hundred thousand (2,500,000) U.S. bushels. Pursuant to this rule, grain elevators shall be limited to particulate matter emissions of no greater than three-hundredths (0.03) grain per dscf. The

source complies with this rule through the use of baghouses as shown in Appendix A, page 5.

- (2) 326 IAC 6.5-1-2(a) applies to the Wet Leg, the Dry Leg, Leg C1, internal transfer operations, serving the "77 House", and one (1) shipping leg, serving the "57 House" because these facilities were constructed after January 13, 1977. Pursuant to this rule, grain elevators shall be limited to particulate matter emissions of no greater than three-hundredths (0.03) grain per dscf. The source complies with this rule through the use of baghouses as shown in Appendix A, page 5.
- (3) 326 IAC 6.5-1-2(d)(2) applies to the Wet Leg, the Dry Leg, the twin truck dump, the South rail loadout, the North rail loadout, the North and South rail receiving operations, the internal transfer operations, serving the "65 House", the truck loadout sprouts, Leg 7, Leg 8, Leg C1, internal transfer operations, serving the "77 House", internal transfer operations, serving the "57 House", five (5) shipping legs, serving the "57 House", and one (1) shipping leg, serving the "57 House". Pursuant to this rule, all grain elevators shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:
 - (A) Housekeeping practices shall be conducted as follows:
 - (i) Areas to be swept and maintained shall include at a minimum:
 - (AA) general grounds, yard, and other open areas;
 - (BB) floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations; and;
 - (CC) grain driers with respect to accumulated particulate matter.
 - (ii) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (iii) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (iv) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
 - (B) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (i) Malfunctions.
 - (ii) Breakdowns.
 - (iii) Improper adjustment.
 - (iv) Operating above the rated or designed capacity.
 - (v) Not following designed operating specifications.
 - (vi) Lack of good preventive maintenance care.
 - (vii) Lack of critical and proper spare replacement parts on hand.
 - (viii) Lack of properly trained and experienced personnel.
 - (C) Emissions from the affected areas, operations equipment, and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

Allowable limits are listed below for the affected units.

Facility	Process Weight Rate (tons/hr)	Stack Flow Rate (acfm)	Allowable Particulate Emission (lb/hr)* (6.5-1-2)	Potential Emissions (lb/hr)**	Controlled Emissions (lb/hr)	In Compliance?
Natural Gas Dryer	75			16.50	16.50	yes
Dry Leg	224	40000	10.29	13.66	0.14	yes
Wet Leg	224	40000	10.29	13.66	0.14	yes
Truck Dump	350	30000	7.71	30.10	3.01	yes
South rail loadout	336	43000	11.06	28.90	2.89	yes
North rail loadout	1100	43000	11.06	29.70	2.97	yes
North rail receiving	270	16000	4.11	48.60	0.49	yes
South rail receiving	270	16000	4.11	48.60	0.49	yes
"65" internal transfer	336	40000	10.29	20.50	0.20	yes
Truck Loadouts	270	40000	10.29	23.22	2.32	yes
Leg 7	476	40000	10.29	29.04	0.29	yes
Leg 8	476	40000	10.29	29.04	0.29	yes
Leg C1	840	40000	10.29	51.24	0.51	yes
"77" internal transfer	336	24000	6.17	20.50	0.20	yes
"57" internal transfer	336	43000	11.06	20.50	0.20	yes
Leg 1	476	43000	11.06	29.04	0.29	yes
Leg 2	476	43000	11.06	29.04	0.29	yes
Leg 3	476	43000	11.06	29.04	0.29	yes
Leg 4	476	43000	11.06	29.04	0.29	yes
Leg 5	476	43000	11.06	29.04	0.29	yes
"57" shipping leg	840	43000	11.06	51.24	0.51	yes

*E= Flow rate of stack (acfm) * .03 gr/cm * 1 lb / 7000 gr * 60 min / hr, pursuant to 6.5-2-1

** For purposes of determining compliance with this rule, potential emissions were calculated using the maximum process weight rates for each unit and the PM emission factors, in lb/ton from US EPA's AP-42, Section 9.9.1, Table 9.9.1-1. These calculations do not represent the PTE of the source, which is based on the maximum grain throughput to the source, calculated using guidance from US EPA.

Compliance Determination and Monitoring Requirements

The Compliance Determination Requirements applicable to the stationary grain elevator are as follows:

- (a) Particulate Control
 The baghouses, identified as Baghouse #1, Baghouse #6, Baghouse #7, Baghouse #8, Baghouse #9, and Baghouse #10, for particulate control shall be in operation and control emissions from the affected facilities at all times these facilities are in operation.

The Compliance Monitoring Requirements applicable to the stationary grain elevator are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse #1	Water Pressure Drop	Once/day when in operation	1.0 to 8.0 inches	Response Steps
	Visible Emissions		Normal - Abnormal	
Baghouse #6	Water Pressure Drop	Once/day when in operation	1.0 to 8.0 inches	Response Steps
	Visible Emissions		Normal - Abnormal	
Baghouse #7	Water Pressure Drop	Once/day when in operation	1.0 to 8.0 inches	Response Steps
	Visible Emissions		Normal - Abnormal	
Baghouse #8	Water Pressure Drop	Once/day when in operation	1.0 to 8.0 inches	Response Steps
	Visible Emissions		Normal - Abnormal	
Baghouse #9	Water Pressure Drop	Once/day when in operation	1.0 to 8.0 inches	Response Steps
	Visible Emissions		Normal - Abnormal	
Baghouse #10	Water Pressure Drop	Once/day when in operation	1.0 to 8.0 inches	Response Steps
	Visible Emissions		Normal - Abnormal	

Recommendation

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

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

An application for the purposes of this review was received on September 30, 2008.

Conclusion

The operation of this stationary grain elevator shall be subject to the conditions of the attached MSOP Renewal No. M097-27052-00028.

**Appendix A: Emission Calculations
Emissions Summary**

Company Name: ADM Grain Company
Address City IN Zip: 1901 South Sherman Drive, Indianapolis, IN 46204
Permit Number: 097-27052-00028
Reviewer: Adam Estes
Date: 6-Nov-08

Criteria Pollutant Potential Emissions (uncontrolled) in tons/yr

Unit	PM	PM10	PM2.5	SO2	Nox	VOC	HAP	CO
Grain Elevator Processes	199.77	65.97	65.97					
Natural Gas Dryer	0.23	0.93	0.93	0.07	12.26	0.67	0.231*	10.3
TOTAL	200	66.9	66.9	0.07	12.26	0.67	0	10.3

*Combined HAPs see Combustion

**Appendix A: Emissions Calculations
Particulate Emissions**

Company Name: ADM Grain Company
Address City IN Zip: 1901 South Sherman Drive, Indianapolis, IN 46204
Permit Number: 097-27052-00028
Reviewer: Adam Estes
Date: 6-Nov-08

Grain	Percentage of Grain	Bushels per year*	Weight (lbs/bushel)	Grain Throughput (tons/yr) (1)
Corn	83	19920000	56	557760
Bean	13	3120000	56	87360
Wheat	3	720000	60	21600
Total				666720

*Based on "Calculating Potential to Emit (PTE) and Other Guidance for Grain Handling Facilities," issued November 14, 1995, PTE from country grain elevators can be determined using the current AP-42 emission factors and an actual annual throughput multiplied by an adjustment factor of 1.2. In order to be conservative, a multiplier of 1.5 has been used. In the past five years, the highest annual throughput is 16 million bushels, 83% corn, 13% bean, and 3% wheat.

(1) 16 million bushels / year * 1.5 * % grain type * lbs / bushel *1 ton / 2000 lbs

Process	Pollutant	Emission Factor (lb/ton)	Control Efficiency	Throughput (tons)	Potential Emissions Before Controls (tons/yr) (2)	Potential Emissions After Controls (tons/yr) (3)
Truck or Rail Receiving						
Straight Truck	PM	0.18	99%	166680	15.00	0.15
	PM10	0.059	99%	166680	4.92	0.05
Hopper Truck	PM	0.035	99%	500040	8.75	0.09
	PM10	0.0078	99%	500040	1.95	0.02
Internal Handling						
Internal Handling	PM	0.061	99%	1333440	40.67	0.41
	PM10	0.034	99%	1333440	22.67	0.23
Bins	PM	0.025		666720	8.33	8.33
	PM10	0.0063		666720	2.10	2.10
Worst Case Shipping (Truck)						
	PM	0.086	90%	666720	28.67	2.87
	PM10	0.029	90%	666720	9.67	0.97
Drying						
Grain	PM	0.22		666720	73.34	73.34
	PM10	0.055		666720	18.33	18.33
Cleaning						
	PM	0.075	99%	666720	25.00	0.25
	PM10	0.019	99%	666720	6.33	0.06
Total						
	PM				199.77	85.43
	PM10				65.97	21.76

(2) PTE before controls (tons / yr) = emissions factor (lb/ton) * throughput (ton) * 1 ton / 2000 lbs

(3) PTE after controls (tons / yr) = emissions factor (lb/ton) * throughput (ton) * 1 ton / 2000 lbs * (1-control efficiency)

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Natural Gas Dryer

Company Name: ADM Grain Company

Address City IN Zip: 1901 South Sherman Drive, Indianapolis, IN 46204

Permit Number: 097-27052-00028

Reviewer: Adam Estes

Date: 6-Nov-08

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

28.0

245.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.23	0.93	0.07	12.26	0.67	10.30

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Natural Gas Dryer

HAPs Emissions

Company Name: ADM Grain Company

Address City IN Zip: 1901 South Sherman Drive, Indianapolis, IN 46204

Permit Number: 097-27052-00028

Reviewer: Adam Estes

Date: 6-Nov-08

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.575E-04	1.472E-04	9.198E-03	2.208E-01	4.170E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.132E-05	1.349E-04	1.717E-04	4.660E-05	2.575E-04

Methodology is the same as page 1.

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

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

**Appendix A: Emissions Calculations
Paved and Unpaved Roads**

Company Name: ADM Grain Company
Address City IN Zip: 1901 South Sherman Drive, Indianapolis, IN 46204
Permit Number: 097-27052-00028
Reviewer: Adam Estes
Date: 6-Nov-08

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13. Vehicles make one trip through facility (one-way).

**** unpaved roads ****

I. Heavy Duty Diesel

3.04 trip/hr x
 0.06 mile/trip x
 1 (round trip) x
 8760 hr/yr = 1597.824 miles per year

Method 1: $E_f = k \cdot [(s/12)^{0.8}] \cdot [(W/3)^b] / [(M/0.2)^c] \cdot [(365-p)/365] \cdot (S/15)$
 = 6.32 lb/mile for PM
 = 1.32 lb/mile for PM-10

- where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
- s = 4.8 mean % silt content of unpaved roads
- b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
- c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
- W = 27 tons average vehicle weight
- M = 0.2 surface material moisture content, % (default is 0.2 for dry)
- p = 125.0 number of days with at least 0.01 in. of precipitation per year
- S = 10.0 mph speed limit

1.32 lb/mi x 1597.824 mi/yr = **1.05 tons/yr PM-10**
6.32 lb/mi x 1597.824 mi/yr = **5.05 tons/yr PM**

I. Light Duty gas car/truck used by customers and employees

0.75 trip/hr x
 0.06 mile/trip x
 1 (round trip) x
 8760 hr/yr = 394.2 miles per year

Method 1: $E_f = k \cdot [(s/12)^{0.8}] \cdot [(W/3)^b] \cdot [(M/0.2)^c] \cdot [(365-p)/365] \cdot (S/15)$
 = 1.72 lb/mile for PM
 = 0.47 lb/mile for PM-10
 where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
 s = 4.8 mean % silt content of unpaved roads
 b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
 c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
 W = 2 tons average vehicle weight
 M = 0.2 surface material moisture content, % (default is 0.2 for dry
 p = 125.0 number of days with at least 0.01 in. of precipitation per year
 S = 10.0 mph speed limit

0.47 lb/mi x 394.2 mi/yr = **0.09 tons/yr PM-10**
1.72 lb/mi x 394.2 mi/yr = **0.34 tons/yr PM**

**** unpaved roads ****

3.79 trip/hr x
 0.33 mile/trip x
 1 (round trip) x
 8760 hr/yr = 10956.13 miles per year

Method 1: $E_f = k \cdot [(sL/2)^{0.65}] \cdot [(W/3)^{1.5}]$
 = 3.74 lb/mile for PM
 = 0.73 lb/mile for PM-10
 where k = 0.016 (particle size multiplier for PM-10) (k=0.082 for PM-30 or TSP)
 sL = 7.1 mean % silt content of unpaved roads
 W = 22 tons average vehicle weight

0.73 lb/mi x 10956.13 mi/yr = **3.99 tons/yr PM-10**
3.74 lb/mi x 10956.13 mi/yr = **20.46 tons/yr PM**

**Appendix A: Emissions Calculations
326 IAC 6.5-1-2 Compliance Determination**

Company Name: ADM Grain Company
Address City IN Zip: 1901 South Sherman Drive, Indianapolis, IN 46204
Permit Number: 097-27052-00028
Reviewer: Adam Estes
Date: 6-Nov-08

Facility	Process Weight Rate (tons/hr)	Stack Flow Rate (acfm)	Allowable Particulate Emission (lb/hr)* (6.5-1-2)	Potential Emissions (lb/hr)**	Controlled Emissions (lb/hr)	In Compliance?
Natural Gas Dryer	75			16.50	16.50	yes
Dry Leg	224	40000	10.29	13.66	0.14	yes
Wet Leg	224	40000	10.29	13.66	0.14	yes
Truck Dump	350	30000	7.71	30.10	3.01	yes
South rail loadout	336	43000	11.06	28.90	2.89	yes
North rail loadout	1100	43000	11.06	29.70	2.97	yes
North rail receiving	270	16000	4.11	48.60	0.49	yes
South rail receiving	270	16000	4.11	48.60	0.49	yes
"65" internal transfer	336	40000	10.29	20.50	0.20	yes
Truck Loadouts	270	40000	10.29	23.22	2.32	yes
Leg 7	476	40000	10.29	29.04	0.29	yes
Leg 8	476	40000	10.29	29.04	0.29	yes
Leg C1	840	40000	10.29	51.24	0.51	yes
"77" internal transfer	336	24000	6.17	20.50	0.20	yes
"57" internal transfer	336	43000	11.06	20.50	0.20	yes
Leg 1	476	43000	11.06	29.04	0.29	yes
Leg 2	476	43000	11.06	29.04	0.29	yes
Leg 3	476	43000	11.06	29.04	0.29	yes
Leg 4	476	43000	11.06	29.04	0.29	yes
Leg 5	476	43000	11.06	29.04	0.29	yes
"57" shipping leg	840	43000	11.06	51.24	0.51	yes

*E= Flow rate of stack (acfm) * .03 gr/cm * 1 lb / 7000 gr * 60 min / hr, pursuant to 6.5-2-1

** For purposes of determining compliance with this rule, potential emissions were calculated using the maximum process weight rates for each unit and the PM emission factors, in lb/ton from US EPA's AP-42, Section 9.9.1, Table 9.9.1-1. These calculations do not represent the PTE of the source, which is based on the maximum grain throughput to the source, calculated using guidance from US EPA.