



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: September 3, 2009

RE: Gavilon Grain, LLC / 167-27671-00025

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**

**Gavilon Grain, LLC  
200 Voorhees Street  
Terre Haute, Indiana 47802**

(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.: M167-27671-00025	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: September 3, 2009  Expiration Date: September 3, 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)]

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The Permittee owns and operates a stationary grain elevator.

Source Address:	200 Voorhees Street, Terre Haute, Indiana 47802
Mailing Address:	11 ConAgra Drive, 11-160, Omaha, Nebraska 68102
General Source Phone Number:	(402) 889-4153
SIC Code:	5153
County Location:	Vigo
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 Source Definition

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Gavilon Grain, LLC operates two grain elevators in Terre Haute, one at 200 Voorhees Street This company consists of the following plants:

- (a) Gavilon Grain, LLC is located at 200 E. Voorhees Street, Terre Haute, IN, Plant ID: 167-00025; and
- (b) Gavilon Grain, LLC leased from Grower's Cooperative, Inc. is located at 2600 S. 13th Street, Terre Haute, IN, Plant ID: 167-00150.

Gavilon Grain, LLC operates two grain elevators in Terre Haute, one at 200 E. Voorhees Street (West Facility) and another at 2600 South 13<sup>th</sup> Street (East Facility). On June 5, 2009, IDEM, OAQ determined that the two plants should not be considered one "source" as defined in 326 IAC 1-2-73, because they do not meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;

Gavilon Grain, LLC began operating both plants in 2008. It owns the West Facility and leases the East Facility from Grower's Cooperative, Inc. Gavilon Grain, LLC controls both plants. Therefore, the two plants are under common ownership or control.

- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,

The plants have the same two-digit SIC Code. Both plants have the two-digit SIC code, 51, for Wholesale Trade Non-durable Goods. A plant is considered a support facility if at least fifty percent of its output is dedicated to the other plant. The two plants ship and receive grain independently of each other. Grain is rarely shipped between the two plants. Since the plants have the same two-digit SIC they meet the second element of the definition.

- (3) the plants must be located on contiguous or adjacent properties.

The West Facility is located approximately 1.1 miles from the East Facility. There is no direct physical connection between the two plants. Several management and support staff work with both facilities, including the facility manager, accounting staff and grain merchandisers. This is a typical practice for Gavilon Grain at several of its 70 grain elevators in the United States. Neither plant shares any production employees. The plants are not located on contiguous or adjacent properties, so the third element of the definition is not met. IDEM, OAQ has determined that these plants will not be considered one (1) source, as defined by 326 IAC 2-7-1(22).

### A.3 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) natural gas-fired column grain dryer, identified as Zimmerman Continuous Flow 1, constructed in 1979, with a rated heat input capacity of 18 MMBtu per hour, with a maximum throughput of 3,000 bushels per hour, with plate perforations of 0.0625 - 0.078 inches, using mineral oil as a dust suppressant, and with fugitive emissions exhausting to the atmosphere.
- (b) Two (2) truck unloading pits, with mineral oil applied in conveyor before leg, identified as West Inside Pit and West Outside Pit, constructed in the 1960's, with a combined maximum throughput of 12,000 bushels per hour, using a Mac Dust System for control, and exhausting to stack S-1.
- (c) Headhouse and grain handling consisting of multiple conveyors and grain transfer points located inside the 200 Voorhees Street facility, constructed in 1992, with a maximum throughput of 20,000 bushels per hour, using mineral oil as a dust suppressant, and exhausting indoors.
- (d) Grain storage bins, constructed between 1950 and 1991, using mineral oil as a dust suppressant, consisting of the following:
  - (1) Fourteen (14) storage bins, identified as Bin W1 through Bin W14, each with a storage capacity of 50,740 bushels of grain and;
  - (2) One (1) storage bin, identified as Bin W15, with a storage capacity of 4,016 bushels of grain and;
  - (3) Five (5) storage bins, identified as Bin W16, Bin W17, Bin W19 through Bin W21, each with a storage capacity of 12,060 bushels of grain and;
  - (4) One (1) storage bin, identified as Bin W18, with a storage capacity of 5,020 bushels of grain and;
  - (5) Two (2) storage bins, identified as Bin W22 and Bin W25, each with a storage capacity of 4,336 bushels of grain and;
  - (6) One (1) storage bin, identified as Bin W23, with a storage capacity of 9,468 bushels of grain and;
  - (7) One (1) storage bin, identified as Bin W24, with a storage capacity of 7,533 bushels of grain and;
  - (8) One (1) storage bin, identified as Bin W26, with a storage capacity of 26,868 bushels of grain and;
  - (9) One (1) storage bin, identified as Bin W27, with a storage capacity of 14,581 bushels of grain and;

- (10) One (1) storage bin, identified as Bin W28, with a storage capacity of 23,496 bushels of grain and;
- (11) One (1) storage bin, identified as Bin W29, with a storage capacity of 335,953 bushels of grain and;
- (e) Two (2) load out areas, identified as North and South, constructed in the 1960's, with a combined throughput of 20,000 bushels per hour, using mineral oil as a dust suppressant, and fugitive emissions exhausting to the atmosphere.
- (f) Fugitive emissions from paved roads and parking lots.

## SECTION B GENERAL CONDITIONS

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

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

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- (a) This permit, M167-27671-00025, 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]

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

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

### B.4 Enforceability

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

### B.5 Severability

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

### B.6 Property Rights or Exclusive Privilege

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

### B.7 Duty to Provide Information

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- (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

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- (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)]

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- (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]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ 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]**

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- (a) All terms and conditions of permits established prior to M167-27671-00025 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)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least 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]**

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- (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  
Permit Administration 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 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]**

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(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  
Permit Administration 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**

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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]

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

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(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  
Permit Administration 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]**

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- (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]**

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

#### C.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]**

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Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on May 8, 2009. The plan is included as Attachment A.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management  
Compliance 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.9 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

### **C.10 Compliance Monitoring [326 IAC 2-1.1-11]**

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

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

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

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

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

## **Corrective Actions and Response Steps**

### **C.13 Response to Excursions or Exceedances**

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

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

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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

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

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

**C.15 Malfunctions Report [326 IAC 1-6-2]**

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

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

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

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance 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) One (1) natural gas-fired column grain dryer, identified as Zimmerman Continuous Flow 1, constructed in 1979, with a rated heat input capacity of 18 MMBtu per hour, with a maximum throughput of 3,000 bushels per hour, with plate perforations of 0.0625 - 0.078 inches, using mineral oil as a dust suppressant, and with fugitive emissions exhausting to the atmosphere.
- (b) Two (2) truck unloading pits, with mineral oil applied in conveyor before leg, identified as West Inside Pit and West Outside Pit, constructed in the 1960's, with a combined maximum throughput of 12,000 bushels per hour, using a Mac Dust System for control, and exhausting to stack S-1.
- (c) Headhouse and grain handling consisting of multiple conveyors and grain transfer points located inside the 200 Voorhees Street facility, constructed in 1992, with a maximum throughput of 20,000 bushels per hour, using mineral oil as a dust suppressant, and exhausting indoors.
- (d) Grain storage bins, constructed between 1950 and 1991, using mineral oil as a dust suppressant, consisting of the following:
  - (1) Fourteen (14) storage bins, identified as Bin W1 through Bin W14, each with a storage capacity of 50,740 bushels of grain and;
  - (2) One (1) storage bin, identified as Bin W15, with a storage capacity of 4,016 bushels of grain and;
  - (3) Five (5) storage bins, identified as Bin W16, Bin W17, Bin W19 through Bin W21, each with a storage capacity of 12,060 bushels of grain and;
  - (4) One (1) storage bin, identified as Bin W18, with a storage capacity of 5,020 bushels of grain and;
  - (5) Two (2) storage bins, identified as Bin W22 and Bin W25, each with a storage capacity of 4,336 bushels of grain and;
  - (6) One (1) storage bin, identified as Bin W23, with a storage capacity of 9,468 bushels of grain and;
  - (7) One (1) storage bin, identified as Bin W24, with a storage capacity of 7,533 bushels of grain and;
  - (8) One (1) storage bin, identified as Bin W26, with a storage capacity of 26,868 bushels of grain and;
  - (9) One (1) storage bin, identified as Bin W27, with a storage capacity of 14,581 bushels of grain and;
  - (10) One (1) storage bin, identified as Bin W28, with a storage capacity of 23,496 bushels of grain and;
  - (11) One (1) storage bin, identified as Bin W29, with a storage capacity of 335,953 bushels of grain and;

- (e) Two (2) load out areas, identified as North and South, constructed in the 1960's, with a combined throughput of 20,000 bushels per hour, using mineral oil as a dust suppressant, and fugitive emissions 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 [326 IAC 2-6.1-5(a)(1)]**

**D.1.1 Particulate [326 IAC 6-3-2] [326 IAC 6.5-1-2] [326 IAC 6.5-9-15]**

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

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

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

or

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

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

Emissions Units	Maximum (bushels/hr) for each unit of that type	Maximum Process Weight (tons/hour) for each unit of that type	326 IAC 6-3 Allowable Emission Rate (lbs/hr) for each unit of that type
Two (2) truck unloading pits	6,000	360,000	57.37
Two (2) load out areas	10,000	600,000	63.00
Storage bins constructed prior to January 13, 1977	40,000	2,400,000	79.97

- (b) Pursuant to 326 IAC 6.5-1-1(a)(2) and 326 IAC 6.5-1-2(a) particulate matter (PM) emissions from the storage bins constructed after January 13, 1977 shall each not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

In addition to the mass-based limits, Gavilon Grain, LLC must also comply with the good housekeeping requirements in 326 IAC 6.5-1-2(d)(2).

- (c) Pursuant to 326 IAC 6.5-9-15, the source, identified as Gavilon Grain, LLC, shall meet the following emission limits for Terre Haute Grain in Vigo County:

Source	Process	Emission Limits	
		tons/yr	other units
Terre Haute Grain	Drying	1.7	Comply with 326 IAC 6-4 and good housekeeping practices.
	Handling	16.0	

- (d) Pursuant to 326 IAC 6.5-9-15, the source, identified as Gavilon Grain, LLC, shall meet the following emission limits:
- (1) The existing stationary grain elevator shall be limited to a drying throughput of less than 1,275,000 bushels (38,250 tons) of grain per 12 consecutive month period.
  - (2) The existing stationary grain elevator shall be limited to a throughput of less than 20,000,000 bushels (600,000 tons) of grain per 12 consecutive month period.
  - (3) Particulate Matter (PM) emissions for each of the existing stationary grain elevator shall be limited as follows:

Emission Units	Limited Grain Throughput (tons/yr)	PM Emission Limit (lbs PM / ton)	Limited and Controlled PM Emissions (tons/yr)
Drying	38,250	0.220	1.68
Handling	600,000	0.061	7.32

**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 these facilities and any control devices.

**Compliance Determination Requirements**

**D.1.3 Particulate Control**

- (a) In order to comply with Condition D.1.1(b) and (c), the source shall apply mineral oil at the two (2) truck unloading pits in conveyor before leg at a rate of 0.02 percent by weight at all times the grain elevator is in operation.

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

**D.1.4 Recordkeeping Requirements**

- (a) To document compliance with Condition D.1.1(c) and (d), the Permittee shall maintain monthly records of the grain throughput for the entire source, and for the grain throughput dried.
- (b) All records shall be maintained in accordance with Section C - General Recordkeeping Requirements, of this permit.

#### D.1.5 Reporting Requirements

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A quarterly summary of the information to document compliance with Conditions D.1.1(c) and (d) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION

Source Name: Gavilon Grain, LLC  
Source Address: 200 Voorhees Street, Terre Haute, Indiana 47802  
Mailing Address: 11 ConAgra Drive, 11-160, Omaha, Nebraska 68102  
MSOP No.: M167-27671-00025

**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).

<b>Company Name:</b>	Gavilon Grain, LLC
<b>Address:</b>	200 Voorhees Street
<b>City:</b>	Terre Haute, Indiana 47802
<b>Phone #:</b>	(402) 889-4153
<b>MSOP #:</b>	M167-27671-00025

I hereby certify that Gavilon Grain, LLC:

still in operation.

no longer in operation.

I hereby certify that Gavilon Grain, LLC:

in compliance with the requirements of MSOP M167-27671-00025.

not in compliance with the requirements of MSOP M167-27671-00025.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

### MALFUNCTION REPORT

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER: (317) 233-6865

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

**MSOP Quarterly Report**

Source Name: Gavilon Grain, LLC  
 Source Address: 200 Voorhees Street, Terre Haute, Indiana 47802  
 Mailing Address: 200 Voorhees Street, Terre Haute, Indiana 47802  
 MSOP No.: M 167-27671-00025  
 Facilities: Entire Source  
 Parameter: Grain Throughput  
 Limit: Less than 20,000,000 bushels per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Grain Throughput (tons)	Grain Throughput (tons)	Grain Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report.

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

**MSOP Quarterly Report**

Source Name: Gavilon Grain, LLC  
Source Address: 200 Voorhees Street, Terre Haute, Indiana 47802  
Mailing Address: 200 Voorhees Street, Terre Haute, Indiana 47802  
MSOP No.: M 167-27671-00025  
Facilities: One (1) natural gas-fired column grain dryer, identified as Zimmerman Continuous Flow 1  
Parameter: Grain Throughput Dried  
Limit: Less than 1,275,000 bushels per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Grain Throughput (tons)	Grain Throughput (tons)	Grain Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report.

## Attachment A:

### Fugitive Particulate Matter Control Plan Gavilon Grain, LLC

326 IAC 6-5-5	
1. Name and Address of the Source:	Gavilon Grain, LLC 200 Voorhees Street Terre Haute, Indiana 47802
2. Name and Address of the owner or operator responsible for execution of the plan:	Gavilon Grain, LLC Mark Sethre, Facility Manager 200 Voorhees Street Terre Haute, Indiana 47802
3. Identification of all processes, operations and areas which have the potential to emit fugitive particulate matter in accordance with 326 IAC 6-5-4:	Grain unloading from trucks and rail Grain storage bin vents Grain conveyors and legs Grain loadouts
4. A map of the source showing aggregate pile areas, access areas around the aggregate pile, unpaved roads, paved roads, parking lots, and location of conveyor transfer points, etc.	A site plan was submitted on May 8, 2009.
5. The number and mix of vehicular activity occurring on paved roads, unpaved roads, and parking lots.	Trucks on paved roads: 15,750
6. Type and quantity of material handled.	Grain including corn, soybeans, and wheat. Annual throughput is approximately 15 million bushels per year.
7. Equipment used to maintain aggregate piles.	Not applicable
8. A description of the measures to be implemented to control fugitive particulate matter emissions resulting from emission points identified in subdivision (3).	Baghouse dust control installed at west unloading hopper and mineral oil applied on all west grain. Grain unloading maintains choked conditions. Loadouts have flexible spouts installed to reduce freefall.
9. A description of the dust suppressant material such as oil or chemical including the estimated frequency of application rates and concentrations.	Mineral oil is applied to all west grain.
10. A specification of the particulate matter collection equipment used as a fugitive particulate matter emission control measure.	Mac baghouse installed on west unloading station.
11. A schedule of compliance with the provisions of the control plan. Such schedule shall specify the amount of time the source requires to award any necessary contracts, commence and complete construction, installation, or modification of the fugitive particulate matter control measures.	Not applicable
12. Other relevant data that may be requested by the commissioner, to evaluate the effectiveness of the control plan.	To be determined

Records shall be kept and maintained that document the control measures under this plan. The records shall be available upon the request of the commissioner and shall be retained for three years.

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Gavilon Grain, LLC</b>
<b>Source Location:</b>	<b>200 Voorhees Street, Terre Haute, Indiana 47802</b>
<b>County:</b>	<b>Vigo</b>
<b>SIC Code:</b>	<b>5153</b>
<b>Permit Renewal No.:</b>	<b>M167-27671-00025</b>
<b>Permit Reviewer:</b>	<b>Sarah Conner, Ph. D.</b>

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

**History**

On March 26, 2009, Gavilon Grain, LLC submitted an application to the OAQ requesting to renew its operating permit. Gavilon Grain, LLC was issued a MSOP M167-10829-00025 on June 15, 2004. On May 15, 2009 Gavilon Grain LLC submitted a request for the OAQ to review the source determination from MSOP M167-10829-00025, issued on June 15, 2004.

**Source Definition**

This company consists of the following plants:

- (a) Gavilon Grain, LLC is located at 200 E. Voorhees Street, Terre Haute, IN, Plant ID: 167-00025; and
- (b) Gavilon Grain, LLC leased from Grower's Cooperative, Inc. is located at 2600 S. 13th Street, Terre Haute, IN, Plant ID: 167-00150.

Gavilon Grain, LLC operates two grain elevators in Terre Haute, one at 200 E. Voorhees Street (West Facility) and another at 2600 South 13<sup>th</sup> Street (East Facility). On June 5, 2009, IDEM, OAQ determined that the two plants should not be considered one "source" as defined in 326 IAC 1-2-73, because they do not meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;

Gavilon Grain, LLC began operating both plants in 2008. It owns the West Facility and leases the East Facility from Grower's Cooperative, Inc. Gavilon Grain, LLC controls both plants. Therefore, the two plants are under common ownership or control.

- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,

The plants have the same two-digit SIC Code. Both plants have the two-digit SIC code, 51, for Wholesale Trade Non-durable Goods. A plant is considered a support facility if at least fifty percent of its output is dedicated to the other plant. The two plants ship and receive grain independently of each other. Grain is rarely shipped between the two plants. Since the plants have the same two-digit SIC they meet the second element of the definition.

- (3) the plants must be located on contiguous or adjacent properties.

The West Facility is located approximately 1.1 miles from the East Facility. There is no direct physical connection between the two plants. Several management and support staff work with both facilities, including the facility manager, accounting staff and grain merchandisers. This is a typical practice for Gavilon Grain at several of its 70 grain elevators in the United States. Neither plant shares any production employees. The plants are not located on contiguous or adjacent properties, so the third element of the definition is not met. IDEM, OAQ has determined that these plants will not be considered one (1) source, as defined by 326 IAC 2-7-1(22).

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

- (a) One (1) natural gas-fired column grain dryer, identified as Zimmerman Continuous Flow 1, constructed in 1979, with a rated heat input capacity of 18 MMBtu per hour, with a maximum throughput of 3,000 bushels per hour, with plate perforations of 0.0625 - 0.078 inches, using mineral oil as a dust suppressant, and with fugitive emissions exhausting to the atmosphere.
- (b) Two (2) truck unloading pits, with mineral oil applied in conveyor before leg, identified as West Inside Pit and West Outside Pit, constructed in the 1960's, with a combined maximum throughput of 12,000 bushels per hour, using a Mac Dust System for control, and exhausting to stack S-1.
- (c) Headhouse and grain handling consisting of multiple conveyors and grain transfer points located inside the 200 Voorhees Street facility, constructed in 1992, with a maximum throughput of 20,000 bushels per hour, using mineral oil as a dust suppressant, and exhausting indoors.
- (d) Grain storage bins, constructed between 1950 and 1991, using mineral oil as a dust suppressant, consisting of the following:
- (1) Fourteen (14) storage bins, identified as Bin W1 through Bin W14, each with a storage capacity of 50,740 bushels of grain and;
  - (2) One (1) storage bin, identified as Bin W15, with a storage capacity of 4,016 bushels of grain and;
  - (3) Five (5) storage bins, identified as Bin W16, Bin W17, Bin W19 through Bin W21, each with a storage capacity of 12,060 bushels of grain and;
  - (4) One (1) storage bin, identified as Bin W18, with a storage capacity of 5,020 bushels of grain and;
  - (5) Two (2) storage bins, identified as Bin W22 and Bin W25, each with a storage capacity of 4,336 bushels of grain and;
  - (6) One (1) storage bin, identified as Bin W23, with a storage capacity of 9,468 bushels of grain and;
  - (7) One (1) storage bin, identified as Bin W24, with a storage capacity of 7,533 bushels of grain and;
  - (8) One (1) storage bin, identified as Bin W26, with a storage capacity of 26,868 bushels of grain and;
  - (9) One (1) storage bin, identified as Bin W27, with a storage capacity of 14,581 bushels of grain and;

- (10) One (1) storage bin, identified as Bin W28, with a storage capacity of 23,496 bushels of grain and;
- (11) One (1) storage bin, identified as Bin W29, with a storage capacity of 335,953 bushels of grain and;
- (e) Two (2) load out areas, identified as North and South, constructed in the 1960's, with a combined throughput of 20,000 bushels per hour, using mineral oil as a dust suppressant, and fugitive emissions exhausting to the atmosphere.
- (f) Fugitive emissions from paved roads and parking lots.

### Existing Approvals

Since the issuance of the MSOP M167-10829-00025 on June 15, 2004, the source has constructed or has been operating under the following approval as well:

- (a) Notice Only Change No. 167-26805-00025 issued on August 28, 2008.

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

The source submitted an application to IDEM, OAQ for the renewal of their operation permit late on March 26, 2009. Pursuant to 326 IAC 2-6.1-7(a) as listed in condition B.4 of MSOP M167-10829-00025, the Permittee should have applied for the renewal of their operation permit at least (90) days prior to the expiration date of June 15, 2009. Therefore, the applicant should have submitted a renewal application to IDEM, OAQ by March 17, 2009.

IDEM is reviewing this matter and will take appropriate action.

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### County Attainment Status

The source is located in Vigo County

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective February 6, 2006, for the Terre Haute area, including Vigo County, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

- (a) Ozone Standards
  - (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
  - (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
  - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
  - (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM2.5  
Vigo County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) Other Criteria Pollutants  
Vigo County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive emissions
  - (1) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
  - (2) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, and Part 70 Permit applicability.

### Unrestricted Potential Emissions

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

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

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

### **Federal Rule Applicability**

#### New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60.300, Subpart DD, are not included in the permit for the grain elevator because it has a permanent storage capacity less than 2.5 million U.S. bushels. The maximum capacity of the source is 1.21 million U.S. bushels.
- (b) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in the permit renewal.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

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

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

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

This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the entire source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

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

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

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

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

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

#### 326 IAC 6-4 (Fugitive Dust Emissions Limitations)

The source is subject to the requirements of 326 IAC 6-4, because the source has the potential to emit fugitive particulate emissions from paved roads, unloading pits and loadout operations. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

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

The source is subject to the requirements of 326 IAC 6-5, because the paved roads, unloading pits and loadout operations have combined potential fugitive particulate emissions greater than 25 tons per year. Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, submitted on May 8, 2009, which is included as Attachment A to the permit.

**State Rule Applicability – Individual Facilities**

Grain Elevator Operations

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

The grain dryers are not subject to the requirements of 326 IAC 6-2, because they are not sources of indirect heating.

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from each of the listed emission units shall be limited by the following:

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

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

or

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

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

Emissions Units	Maximum (bushels/hr) for each unit of that type	Maximum Process Weight (tons/hour) for each unit of that type	326 IAC 6-3 Allowable Emission Rate (lbs/hr) for each unit of that type	Maximum Particulate Emissions before control (lb/hour)
Two (2) truck unloading pits	6,000	360,000	57.37	32.40
Two (2) load out areas	10,000	600,000	63.00	25.80
Storage bins constructed prior to January 13, 1977	40,000	2,400,000	79.97	30.00

The source applies mineral oil at the two (2) truck unloading pits in conveyor before leg at a rate of 0.02 percent by weight at the grain elevator to control particulate. In addition, the source operates a baghouse, the Mac Dust System, at the two (2) truck unloading pits, identified as West Inside Pit and West Outside Pit to control particulate. However these facilities are able to comply with 326 IAC 6-3-2 without the use of control devices.

The dryer, handling and storage bins constructed after January 13, 1997 are not subject to the provisions of 326 IAC 326 IAC 6-3-2 because they are subject to 326 IAC 6.5, and 326 IAC 6.5 is more stringent than 326 IAC 6-3-2.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

- (a) Pursuant to 326 IAC 6.5-1-1(a)(2) and 326 IAC 6.5-1-2(a) particulate matter (PM) emissions from the storage bins constructed after January 13, 1977 shall each not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

In addition to the mass-based limits, Gavilon Grain, LLC must also comply with the good housekeeping requirements in 326 IAC 6.5-1-2(d)(2).

- (b) Pursuant to 326 IAC 6.5-9-15, the source, identified as Gavilon Grain, LLC, shall meet the following emission limits for Terre Haute Grain in Vigo County:

Source	East Km	North Km	Process	Emission Limits	
				tons/yr	other units
Terre Haute Grain	464.21	4365.73	Drying	1.7	Comply with 326 IAC 6-4 and good housekeeping practices.
	464.21	4365.81	Handling	16.0	

This source is no longer combined with the source at 2600 S. 13th St., Terre Haute, IN 47802. Therefore this source only has to show compliance with the portion of 326 IAC 6.5-9-15 that is specific to the facility located at 200 E. Voorhees St., Terre Haute, IN 47802. The uncontrolled potential to emit particulate matter at 200 E. Voorhees St. exceeds the limits set forth in 326 IAC 6.5 (see calculations in appendix A). Therefore, in order to show compliance with 326 IAC 6.5, the source shall apply mineral oil at the two (2) truck unloading pits in conveyor before leg at a rate of 0.02 percent by weight at all times the grain elevator is in operation.

In order to show compliance with 326 IAC 6.5-9-15, the source, identified as Gavilon Grain, LLC, shall meet the following emission limits:

- (1) The existing stationary grain elevator shall be limited to a drying throughput of less than 1,275,000 bushels (38,250 tons) of grain per 12 consecutive month period.
- (2) The existing stationary grain elevator shall be limited to a throughput of less than 20,000,000 bushels (600,000 tons) of grain per 12 consecutive month period.
- (3) Particulate Matter (PM) emissions for each of the existing stationary grain elevator shall be limited as follows:

Emission Units	Limited Grain Throughput (tons/yr)	PM Emission Limit (lbs PM / ton)	Limited and Controlled PM Emissions (tons/yr)
Drying	38,250	0.220	1.68
Handling	600,000	0.061	7.32

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, will show compliance with 326 IAC 6.5-9-15 (see calculations in appendix A).

### **Record Keeping and Reporting Requirements**

To document compliance with 326 IAC 6.5, the Permittee shall maintain monthly records of the grain throughput for the entire source, and for the grain throughput dried.

### **Recommendation**

The staff recommends to the Commissioner that 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 March 26, 2009. Additional information was received on April 9, 2009, April 14, 2009, May 1, 2009, May 8, 2009, May 15, 2009, June 22, 2009, and July 7, 2009.

### **Conclusion**

The operation of this stationary grain elevator shall be subject to the conditions of the attached MSOP Renewal No. M167-27671-00025.

**Appendix A: Emissions Calculations  
Summary**

**Company Name: Gavilon Grain, LLC**  
**Address City IN Zip: 200 Voorhees Street, Terre Haute, Indiana 47802**  
**Permit Number: M167-27671-00025**  
**Reviewer: Sarah Conner, Ph. D.**  
**Date: 7/7/2009**

<b>Uncontrolled Potential Emissions (tons/year)</b>								
Pollutant	Natural Gas Combustion	Grain Receiving	Grain Shipping and Packaging	Headhouse and Grain Handling	Grain Drying	Grain storage	Mitigated West Paved Roads	<b>TOTAL</b>
PM	0.15	37.04	6.88	12.76	36.69	5.23	10.54	<b>109.29</b>
PM10	0.60	12.13	1.02	7.11	9.17	1.32	2.05	<b>33.41</b>
PM2.5	0.60	2.06	0.17	1.21	1.57	0.23	0.31	<b>6.14</b>
SO2	0.05	-	-	-	-	-	-	<b>0.05</b>
NOx	7.88	-	-	-	-	-	-	<b>7.88</b>
VOC	0.43	-	-	-	-	-	-	<b>0.43</b>
CO	6.62	-	-	-	-	-	-	<b>6.62</b>
total HAPs	0.15	-	-	-	-	-	-	<b>0.15</b>
worst case single HAP	0.14 (Hexane)	-	-	-	-	-	-	<b>0.14 (Hexane)</b>

Total emissions based on rated capacity at 8,760 hours/year or based on the maximum throughput of grain received as described in the EPA memorandum dated November 14, 1995 on calculating the potential to emit and other guidance for grain handling facilities.

<b>Controlled Potential Emissions (tons/year)</b>								
Pollutant	Natural Gas Combustion	Grain Receiving	Grain Shipping and Packaging	Headhouse and Grain Handling	Grain Drying	Grain storage	Mitigated West Paved Roads	<b>TOTAL</b>
PM	0.15	2.96	2.75	5.10	14.68	2.09	10.54	<b>38.27</b>
PM10	0.60	0.97	0.41	2.85	3.67	0.53	2.05	<b>11.07</b>
PM2.5	0.60	0.16	0.07	0.49	0.63	0.09	0.31	<b>2.34</b>
SO2	0.05	-	-	-	-	-	-	<b>0.05</b>
NOx	7.88	-	-	-	-	-	-	<b>7.88</b>
VOC	0.43	-	-	-	-	-	-	<b>0.43</b>
CO	6.62	-	-	-	-	-	-	<b>6.62</b>
total HAPs	0.15	-	-	-	-	-	-	<b>0.15</b>
worst case single HAP (Hexane)	0.14 (Hexane)	-	-	-	-	-	-	<b>0.14 (Hexane)</b>

Total emissions based on rated capacity at 8,760 hours/year or based on the maximum throughput of grain received as described in the EPA memorandum dated November 14, 1995 on calculating the potential to emit and other guidance for grain handling facilities.

**Appendix A: Emissions Calculations  
Grain Elevator - Wheat and Soy - West End**

**Company Name:** Gavilon Grain, LLC  
**Address City IN Zip:** 200 Voorhees Street, Terre Haute, Indiana 47804  
**Permit Number:** M167-27671-00025  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 7/7/2009

Grain	<sup>1</sup> bushels/year	<sup>2</sup> lbs / bushel	Grain Throughput (tons/year)
Wheat and Soybeans processed	2,827,890	60	84,837

Note 1: Total maximum amount of grain received equals the 5 year maximum received multiplied by a factor of 1.2. This is based on the EPA memorandum dated November 14, 1995 on calculating the potential to emit and other guidance for grain handling facilities. In addition, mineral oil is applied at the two (2) truck unloading pits in conveyor before leg at a rate of 0.02 percent by weight.

Note 2: Assumes 60 lb/bushel for Wheat and Soybeans

Unloading/Receiving					
<sup>3</sup> Strait Truck (lb/ton)			<sup>3</sup> Railcar		
PM	PM-10	PM2.5	PM	PM-10	PM2.5
0.18	0.059	0.01	0.032	0.0078	0.0013

<sup>4</sup> Drying		
PM	PM-10	PM2.5
0.22	0.055	0.0094

Unloading/ Receiving	PM	PM10	PM2.5
Strait Truck	7.483	2.453	0.416
Railcar	0.027	0.007	0.001
Total uncontrolled	7.510	2.459	0.417
<sup>4</sup> Controlled (60%)	0.601	0.197	0.033

Drying	PM	PM10	PM2.5
Total uncontrolled	-	-	-

Note 5: Wheat and Soy are not dried

Note 3: Assumes that 98% of receiving is done by strait truck and 2% is done by railcar.

Note 4: Mineral oil has a control efficiency of 60 to 80%. A control efficiency of 60% is assumed for mineral oil for a conservative estimate. Unloading is also controlled by the Mac Dust System, with an assumed efficiency of 80%.

<sup>5</sup> Shipping					
Truck (lb/ton)			Railcar		
PM	PM-10	PM2.5	PM	PM-10	PM2.5
0.086	0.029	0.0049	0.027	0.0022	0.00037

Headhouse and Grain Handling		
PM	PM-10	PM2.5
0.061	0.034	0.0058

<sup>6</sup> Storage		
PM	PM-10	PM2.5
0.025	0.0063	0.0011

Shipping	PM	PM10	PM2.5
Strait Truck	0.365	0.123	0.021
Railcar	1.031	0.084	0.014
Total uncontrolled	1.396	0.207	0.035
<sup>4</sup> Controlled (60%)	0.558	0.083	0.014

	PM	PM10	PM2.5
Corn	2.588	1.442	0.246
Total uncontrolled	2.588	1.442	0.246
<sup>4</sup> Controlled (60%)	1.035	0.577	0.098

Note 4: Mineral oil has a control efficiency of 60 to 80%. A control efficiency of 60% is assumed for mineral oil for a conservative estimate.

storage	PM	PM10	PM2.5
uncontrolled	1.060	0.267	0.047
<sup>4</sup> Controlled (60%)	0.424	0.107	0.019

Note 4: Mineral oil has a control efficiency of 60 to 80%. A control efficiency of 60% is assumed for mineral oil for a conservative estimate.

**Methodology**

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03)

Potential Emissions (ton/yr) = Throughput (ton/yr) \* Emission factor (lb/ton) / 2000 (lbs/ton)

Controlled Potential Emissions (ton/yr) = Throughput (ton/yr) \* Emission factor (lb/ton) / 2000 (lbs/ton) \* (1-Control Efficiency)

**Appendix A: Emissions Calculations  
Grain Elevator - Corn - West End**

**Company Name:** Gavilon Grain, LLC  
**Address City IN Zip:** 200 Voorhees Street, Terre Haute, Indiana 47802  
**Permit Number:** M167-27671-00025  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 7/7/2009

Grain	<sup>1</sup> bushels/year	<sup>2</sup> lbs / bushel	Grain Throughput (tons/year)
Corn processed	11,912,893	56	333,561

Note 1: Total maximum amount of grain received equals the 5 year maximum received multiplied by a factor of 1.2. This is based on the EPA memorandum dated November 14, 1995 on calculating the potential to emit and other guidance for grain handling facilities. In addition, mineral oil is applied at the two (2) truck unloading pits in conveyor before leg at a rate of 0.02 percent by weight.

Note 2: Assumes 56 lb/bushel for corn.

Unloading/Receiving					
<sup>3</sup> Strait Truck (lb/ton)			<sup>3</sup> Railcar		
PM	PM-10	PM2.5	PM	PM-10	PM2.5
0.18	0.059	0.01	0.032	0.0078	0.0013

Unloading/ Receiving	PM	PM10	PM2.5
Strait Truck	29.420	9.643	1.634
Railcar	0.107	0.026	0.004
Total uncontrolled	29.527	9.669	1.639
<sup>4</sup> Controlled	2.362	0.774	0.131

Note 3: Assumes that 98% of receiving is done by strait truck and 2% is done by railcar.

Note 4: Mineral oil has a control efficiency of 60 to 80%. A control efficiency of 60% is assumed for mineral oil for a conservative estimate. Unloading is also controlled by the Mac Dust System, with an assumed efficiency of 80%.

<sup>6</sup> Shipping					
Truck (lb/ton)			Railcar		
PM	PM-10	PM2.5	PM	PM-10	PM2.5
0.086	0.029	0.0049	0.027	0.0022	0.00037

Shipping	PM	PM10	PM2.5
Strait Truck	1.434	0.484	0.082
Railcar	4.053	0.330	0.056
Total uncontrolled	5.487	0.814	0.137
<sup>4</sup> Controlled (60%)	2.195	0.326	0.055

Note 4: Mineral oil has a control efficiency of 60 to 80%. A control efficiency of 60% is assumed for mineral oil for a conservative estimate.

Note 6: Assumes that 10% of shipping is done by truck and 90% is done by railcar.

<sup>5</sup> Drying		
PM	PM-10	PM2.5
0.22	0.055	0.0094

Drying	PM	PM10	PM2.5
Total uncontrolled	36.692	9.173	1.568
<sup>4</sup> Controlled (60%)	14.677	3.669	0.627

Note 4: Mineral oil has a control efficiency of 60 to 80%. A control efficiency of 60% is assumed for mineral oil for a conservative estimate.

Note 5: PTE is calculated assuming that 100% of corn is dried. The source estimates that only 4% of corn is actually dried at this facility.

Headhouse and Grain Handling		
PM	PM-10	PM2.5
0.061	0.034	0.0058

	PM	PM10	PM2.5
Corn	10.174	5.671	0.967
Total uncontrolled	10.174	5.671	0.967
<sup>4</sup> Controlled (60%)	4.069	2.268	0.387

Note 4: Mineral oil has a control efficiency of 60 to 80%. A control efficiency of 60% is assumed for mineral oil for a conservative estimate.

<sup>7</sup> Storage		
PM	PM-10	PM2.5
0.025	0.0063	0.0011

storage	PM	PM10	PM2.5
uncontrolled	4.170	1.051	0.183
<sup>4</sup> Controlled (60%)	1.668	0.420	0.073

Note 4: Mineral oil has a control efficiency of 60 to 80%. A control efficiency of 60% is assumed for mineral oil for a conservative estimate.

**Methodology**

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03)

Potential Emissions (ton/yr) = Throughput (ton/yr) \* Emission factor (lb/ton) / 2000 (lbs/ton)

Controlled Potential Emissions (ton/yr) = Throughput (ton/yr) \* Emission factor (lb/ton) / 2000 (lbs/ton) \* (1-Control Efficiency)

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

**Company Name:** Gavilon Grain, LLC  
**Address City IN Zip:** 200 Voorhees Street, Terre Haute, Indiana 47802  
**Permit Number:** M167-27671-00025  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 7/7/2009

Heat Input Capacity  
MMBtu/hr

18.0

Potential Throughput  
MMCF/yr

157.7

	Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	PM2.5	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.1	0.6	0.6	0.0	7.9	0.4	6.6

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 is assumed to be equal to PM10.

\*\*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

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

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

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

See next page for HAPs emissions calculations.

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

**Company Name: Gavilon Grain, LLC  
 Address City IN Zip: 200 Voorhees Street, Terre Haute, Indiana 47802  
 Permit Number: M167-27671-00025  
 Reviewer: Sarah Conner, Ph. D.  
 Date: 7/7/2009**

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	1.66E-04	9.46E-05	0.006	0.142	2.68E-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	Total
Potential Emission in tons/yr	3.94E-05	8.67E-05	1.10E-04	3.00E-05	1.66E-04	0.149

Methodology is the same the previous page.

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: Emission Calculations  
Fugitive Dust Emissions - Paved Roads West**

**Company Name: Gavilon Grain, LLC  
Address City IN Zip: 200 Voorhees Street, Terre Haute, Indiana 47802  
Permit Number: M167-27671-00025  
Reviewer: Sarah Conner, Ph. D.  
Date: 7/7/2009**

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

<sup>1</sup>Maximum Annual Grain Received = 14,740,783 tons/yr (corn, soybeans wheat)

<sup>1</sup>Maximum Annual Grain Shipped = 1,474,078 tons/yr (corn, soybeans wheat)

Note 1: Total maximum amount of grain received equals the 5 year maximum received multiplied by a factor of 1.2. This is based on the EPA memorandum dated November 14, 1995 on calculating the potential to emit and other guidance for grain handling facilities.

In addition, it is assumed that 95% is received by Semi Truck and 5% by farm truck, only 10% of grain is shipped by hopper truck from West end of the total grain shipped (10%) by truck.

Process	Vehicle Type	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/yr)
Receiving Semi Truck Entering Full	Truck	13.0	27.0	40.0	518657.2	20746286.8	125.0	0.024	12278.8
Receiving Semi Truck Leave Empty	Truck	13.0	0.0	13.0	0.0	0.0	125.0	0.024	0.0
Receiving Farm Truck Entering Full	Truck	3.0	15.0	18.0	49135.9	884447.0	125.0	0.024	1163.3
Receiving Farm Truck Leave Empty	Truck	3.0	0.0	3.0	0.0	0.0	125.0	0.024	0.0
Shipping Hopper Truck Leaving Full	Truck	13.0	27.0	40.0	5459.5	218382.0	125.0	0.024	129.3
Shipping Hopper Truck Entering Empty	Truck	13.0	0.0	13.0	0.0	0.0	125.0	0.024	0.0
<b>Total</b>					<b>573252.7</b>	<b>21849115.7</b>			<b>13571.32</b>

Average Vehicle Weight Per Trip = 38.1 tons/trip  
Average Miles Per Trip = 0.024 miles/trip

Unmitigated Emission Factor, Ef = [k \* (sL/2)<sup>0.65</sup> \* (W/3)<sup>1.5</sup> - C] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	38.1	38.1	38.1	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00036	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E \* [1 - (p/4N)]

Mitigated Emission Factor, Eext = Ef \* [1 - (p/4N)]  
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.70	0.33	0.05	lb/mile
Mitigated Emission Factor, Eext =	1.55	0.30	0.05	lb/mile

Process	Vehicle Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Receiving Semi Truck Entering Full	Truck	10.42	2.03	0.30	9.53	1.86	0.28
Receiving Semi Truck Leave Empty	Truck	0.00	0.00	0.00	0.00	0.00	0.00
Receiving Farm Truck Entering Full	Truck	0.99	0.19	0.03	0.90	0.18	0.03
Receiving Farm Truck Leave Empty	Truck	0.00	0.00	0.00	0.00	0.00	0.00
Shipping Hopper Truck Leaving Full	Truck	0.11	0.02	0.00	0.10	0.02	0.00
Shipping Hopper Truck Entering Empty	Truck	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>		<b>11.52</b>	<b>2.24</b>	<b>0.33</b>	<b>10.53</b>	<b>2.05</b>	<b>0.31</b>

**Methodology**

- Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]
- Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
- Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]
- Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
- Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
- Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)
- Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)
- Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particle Matter (<2.5 um)
- PTE = Potential to Emit

**Appendix A: Emission Calculations**  
**Fugitive Dust Emissions - Paved Roads West - Passenger Vehicles**

Company Name: **Gavilon Grain, LLC**  
 Address City IN Zip: **200 Voorhees Street, Terre Haute, Indiana 47801**  
 Permit Number: **M167-27671-00025**  
 Reviewer: **Sarah Conner, Ph. D.**  
 Date: **7/7/2009**

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Passenger Vehicle (entering plant)	50.0	1.0	50.0	2.5	125.0	40	0.008	0.4	138.3
Passenger Vehicle (leaving plant)	50.0	1.0	50.0	2.5	125.0	40	0.008	0.4	138.3
<b>Total</b>			<b>100.0</b>		<b>250.0</b>			<b>0.8</b>	<b>276.5</b>

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

Unmitigated Emission Factor, Ef =  $k * (sL/2)^{0.65} * (W/3)^{1.5} - C$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	2.5	2.5	2.5	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00036	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext =  $E * [1 - (p/4N)]$

Mitigated Emission Factor, Eext =  $Ef * [1 - (p/4N)]$   
 where p =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
 N =  days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.03	0.01	0.00	lb/mile
Mitigated Emission Factor, Eext =	0.03	0.00	0.00	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.002	0.000	0.000	0.002	0.000	0.000
Vehicle (leaving plant) (one-way trip)	0.002	0.000	0.000	0.002	0.000	0.000
	<b>0.004</b>	<b>0.001</b>	<b>0.000</b>	<b>0.004</b>	<b>0.001</b>	<b>0.000</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
 PM10 = Particulate Matter (<10 um)  
 PM2.5 = Particle Matter (<2.5 um)  
 PTE = Potential to Emit

**Appendix A: Emission Calculations  
Storage capacity at Gavilon Grain, LLC**

**Company Name:** Gavilon Grain, LLC  
**Address City IN Zip:** 200 Voorhees Street, Terre Haute, Indiana 47802  
**Permit Number:** M167-27671-00025  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 7/7/2009

Number of Bins	Capacity in Bushels	Comined Capacity in Bushels
14	50740	710360
1	4016	4016
5	12060	60300
1	5020	5020
2	4336	8672
1	9468	9468
1	7533	7533
1	26868	26868
1	14581	14581
1	23496	23496
1	335953	335953
Total Capacity at Grain Elevator		1206267

**Appendix A: 326 IAC 6.5-9-15 Compliance  
Summary**

**Company Name: Gavilon Grain, LLC  
Address City IN Zip: 200 E. Voorhees Street, Terre Haute, Indiana 47802  
Permit Number: M167-28089-00150  
Reviewer: Sarah Conner, Ph. D.  
Date: 7/7/2009**

326 IAC 6.5-9-15 for Terre Haute  
Grain located at 200 E. Voorhees  
Street, Terre Haute, IN 47802

Emissions Units	Maximum (bushels/hr) for each unit of that type	Maximum (lbs/hr) for each unit of that type	Maximum Process Weight (tons/hour) <sup>1</sup> for each unit of that type	326 IAC 6.5-9-15 Limit (tons/yr)	<sup>2</sup> Emission factor (lb/ton)	<sup>3</sup> Max PTE Particulate (ton/yr)	Controlled PTE Particulate (tons/yr)	Limited (bushels/yr) for grain	<sup>4</sup> Limited PTE Particulate (ton/yr)	<sup>5</sup> Limited and Controlled PTE Particulate (ton/yr)
Drying	3,000	168,000	84.00	1.70	0.220	80.94	32.38	1,275,000	4.21	1.68
Handling	20,000	1,200,000	600.00	16.00	0.061	160.31	64.12	20,000,000	18.30	7.32

<sup>1</sup>Maximum Process Weight (tons/hour) calculated assuming the highest grain density (60 pounds per bushel for wheat) for all grains handled and dried at the source.

<sup>2</sup>Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03). Handling, the handling emission factor was used. For drying the drying emission factor was used.

<sup>3</sup>PTE is calculated assuming that 100% of grain is dried. The source estimates that only 4% of grain (corn) is actually dried at this facility

<sup>4</sup>Limited PTE is calculated based on the limited bushels/year of grain.

<sup>5</sup>Controlled PTE takes into account the Limited PTE with an assumed 60% control from mineral oil.

**Appendix A: 326 IAC 6-3-2 Compliance  
Summary**

**Company Name:** Gavilon Grain, LLC  
**Address City IN Zip:** 200 E. Voorhees Street, Terre Haute, Indiana 47802  
**Permit Number:** M167-28089-00150  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 7/7/2009

	Maximum (bushels/hr) for each unit of that type	Maximum (lbs/hr) for each unit of that type	Maximum Process Weight (tons/hour) <sup>1</sup> for each unit of that type	326 IAC 6-3 Limit (lbs/hr) for each unit of that type	<sup>2</sup> Emission factor (lb/ton)	Max PTE Particulate (lb/hour)
Two (2) truck unloading pits	6,000	360,000	180.00	57.37	0.180	32.40
Two (2) load out areas	10,000	600,000	300.00	63.00	0.086	25.80
Storage bins constructed prior to January 13, 1977	40,000	2,400,000	1200.00	79.97	0.025	30.00

<sup>1</sup>Maximum Process Weight (tons/hour) calculated assuming the highest grain density (60 pounds per bushel for wheat) for all grains handled and dried at the source.

<sup>2</sup>Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03). Handling, the handling emission factor was used. For drying the drying emission factor was used.

**Appendix A: Emission Calculations**  
**Throughput of Grain Received at Gavilon Grain, LLC**

**Company Name: Gavilon Grain, LLC**  
**Address City IN Zip: 200 Voorhees Street, Terre Haute, Indiana 47802**  
**Permit Number: M167-27671-00025**  
**Reviewer: Sarah Conner, Ph. D.**  
**Date: 7/7/2009**

<b>Year</b>	<b>Soft Red Wheat received in bushels</b>	<b>Yellow Corn received in bushels</b>	<b>Yellow Soybeans received in bushels</b>
2004	48760.31	9927410.72	1704141.80
2005	24098.37	6838560.50	1744814.95
2006	19324.33	6985376.34	1866878.22
2007	16992.21	6713501.23	2307814.56
2008	21577.68	8925285.63	1974898.29
5 Year Maximum Received	48760.31	9927410.72	2307814.56
<sup>1</sup> <b>Maximum Received</b>	<b>58512.37</b>	<b>11912892.86</b>	<b>2769377.47</b>

Note 1: Total maximum amount of grain received equals the 5 year maximum received multiplied by a factor of 1.2. This is based on the EPA memorandum dated November 14, 1995 on calculating the potential to emit and other guidance for grain handling facilities.



# 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](http://www.idem.IN.gov)

## **SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED**

**TO:** Elevator Manager  
Gavilon Grain, LLC  
200 Voorhees St  
Terre Haute, IN 47802

**DATE:** September 3, 2009

**FROM:** Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

**SUBJECT:** Final Decision  
MSOP - Renewal  
167-27671-00025

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Greg Konsor (VP - Gavilon Grain, LLC)  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
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[www.idem.IN.gov](http://www.idem.IN.gov)

September 3, 2009

TO: Vigo County Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

**Applicant Name: Gavilon Grain, LLC**  
**Permit Number: 167-27671-00025**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	MIDENNEY 9/3/2009 Gavilon Grain, LLC 167-27671-00025 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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1		Elevator Manager Gavilon Grain, LLC 200 Voorhees St Terre Haute IN 47802 (Source CAATS) via confirmed delivery										
2		Greg Konsor VP Trade Gavilon Grain, LLC 11 ConAgra Dr, 11-60 Omaha NE 68102 (RO CAATS)										
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
4		Vigo County Board of Commissioners County Annex, 121 Oak Street Terre Haute IN 47807 (Local Official)										
5		Terre Haute City Council and Mayors Office 17 Harding Ave Terre Haute IN 47807 (Local Official)										
6		Vigo County Health Department 147 Oak Street Terre Haute IN 47807 (Health Department)										
7		Vigo Co Public Library 1 Library Square Terre Haute IN 47807-3609 (Library)										
8		J.P. Roehm PO Box 303 Clinton IN 47842 (Affected Party)										
9		George Needham Vigo County Air Pollution Control 103 South Third St. Terre Haute IN 47807 (Local Official)										
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