



# 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: July 1, 2009

RE: Monsanto Global Seed Company / 159-27714-00010

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

## Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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Craig Weitbrecht  
Monsanto Global Seed Company  
908 North Independence Street  
Windfall, Indiana 46076

July 1, 2009

Re: 159-27714-00010  
First Significant Revision to  
M159-25423-00010

Dear Craig Weitbrecht:

Monsanto Global Seed Company was issued a Minor Source Operating Permit (MSOP) Renewal No. M159-25423-00010 on June 4, 2008 for a stationary soybean seed processing plant located at 908 North Independence Street, Windfall, Indiana 46076. On April 2, 2009, the Office of Air Quality (OAQ) received an application from the source requesting a modification to their existing MSOP Renewal No. M159-25423-00010 to allow for the construction and operation of two (2) new seed treaters and two (2) new surge bins. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6(i). Pursuant to the provisions of 326 IAC 2-6.1-6, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

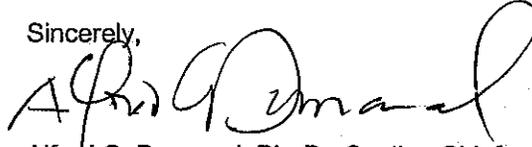
The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.  
If you have any questions on this matter, please contact Sarah Conner, Ph. D. of my staff at 317-234-6555  
or 1-800-451-6027, and ask for extension 4-6555.

Sincerely,



Alfred C. Dumauval, Ph. D., Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document and revised permit

ACD/SLC

cc: File - Tipton County  
Tipton County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section



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

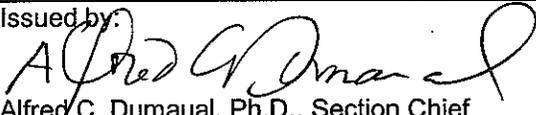
**Monsanto Global Seed Company  
908 North Independence Street  
Windfall, Indiana 46076**

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

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

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

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

First Significant Permit Revision No.: 159-27714-00010	Pages Affected: Entire Permit
Issued by:  Alfred C. Dumauval, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: July 1, 2009  Expiration Date: June 4, 2018

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## SECTION A

## SOURCE SUMMARY

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

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

---

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

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

### A.2 Emission Units and Pollution Control Equipment Summary

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

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

- (g) Four (4) storage bins, identified as Storage Bins, constructed in 2005, each with a maximum grain storage capacity of one thousand (1,000) bushels, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.
- (h) One (1) seed packaging area, identified as Packaging Tower, consisting of storage bins, scales, conveyors, mini-bulk bagging system, bulk bagging system and bag filters, constructed in 1992, with a maximum throughput of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.
- (i) Two (2) seed treaters, identified as Treater 1 and Treater 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.
- (j) Two (2) surge bins, identified as Surge Bin1 and Surge Bin 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.
- (k) Fugitive emissions from paved/unpaved roads and 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, M 159-25423-00010, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

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

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

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

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

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

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

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

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

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

#### C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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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 Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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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.10 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.11 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.12 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.13 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.14 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.15 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.16 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.17 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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

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

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- (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) soybean receiving pit, identified as 1E, constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.
- (b) Two (2) cleaners, identified as 3E, constructed prior to 1978, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.
- (c) Two (2) color sorters, identified as 9EA and 9EB, constructed in 2006, each with a maximum capacity of 15 tons of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.
- (d) One (1) color sorter, identified as 9EC, constructed in 2006, with a maximum capacity of 7.5 tons of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.
- (e) Three (3) gravity tables, identified as 5E, 6E and 7E, constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones, identified as 5A, 6A, 7A as controls, and exhausting to stacks 5A, 6A and 7A.
- (f) Two (2) aspirators, (identified as 2E), constructed prior to 1978, with a maximum combined aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.
- (g) Four (4) storage bins, identified as Storage Bins, constructed in 2005, each with a maximum grain storage capacity of one thousand (1,000) bushels, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.
- (h) One (1) seed packaging area, identified as Packaging Tower, consisting of storage bins, scales, conveyors, mini-bulk bagging system, bulk bagging system and bag filters, constructed in 1992, with a maximum throughput of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.
- (i) Two (2) seed treaters, identified as Treater 1 and Treater 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.
- (j) Two (2) surge bins, identified as Surge Bin1 and Surge Bin 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

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

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

#### D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

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

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

Facility	Process Weight (tons/hr)	Particulate Emission Limit (lbs/hr)
Receiving Pit	90	50.23
Cleaners (2) (per cleaner)	15	25.16
Each of Color Sorters 9EA and 9EB	15	25.16
Gravity Tables (3) (per gravity table)	10	19.18
Packaging	30	40.04
Aspirators	30	40.04
Storage Bins	30	40.04
Seed Treaters	15	25.16

#### D.1.2 Preventive Maintenance Plans [326 IAC 1-6-3]

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

#### D.1.3 VOC Limit [326 IAC 8-1-6]

- (a) The amount of VOC delivered to Treater 1, shall be less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, including coatings, dilution solvents, and cleaning solvents.
- (b) The amount of VOC delivered to Treater 2, shall be less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, including coatings, dilution solvents, and cleaning solvents.

Compliance with these limits shall render the requirements of 326 IAC 8-1-6 (New Facilities; VOC Reduction Requirements) not applicable.

#### D.1.4 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following:

- (a) The existing soybean seed processing plant shall be limited to a throughput of less than 5,000,000 bushels (150,000 tons) of soybeans per 12 consecutive month period.
- (b) Particulate Matter (PM) emissions for each of the soybean seed processing facilities shall be limited as follows:

Emission Units	Limited Soybean Throughput (tons/yr)	PM Emission Limit (lbs PM / ton Soybeans)	Limited PM Emissions (tons/yr)
Soybean receiving pit (1E)	150,000	0.035	2.63
Internal Handling	150,000	0.061	4.58
Cleaners (3E)	150,000	0.750	56.25
Color sorters (9EA, 9EB, and 9EC)	150,000	0.061	13.73
Gravity tables (5E, 6E, and 7E)	150,000	0.750	56.25
Aspirators (2E)	150,000	0.030	2.25
Storage bins	150,000	0.025	1.88
Packaging Tower	150,000	0.061	4.58
Seed Treaters	150,000	0.061	4.58
Surge Bins	150,000	0.025	1.88

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

### Compliance Determination Requirements

#### D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limit contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets, or by determining the VOC content using an alternate method approved by IDEM, Compliance and Enforcement Branch (CEB). IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### D.1.6 Record Keeping Requirement

- (a) To document compliance with condition D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.3.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (3) The total VOC usage for each month.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain monthly records of the grain throughput for the entire source.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.3 and D.1.4(a) 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  
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>	Monsanto Global Seed Company
<b>Address:</b>	908 North Independence Street
<b>City:</b>	Windfall, Indiana 46076
<b>Phone #:</b>	317-903-6747
<b>MSOP #:</b>	M 159-25423-00010

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

<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: Monsanto Global Seed Company  
Source Address: 908 North Independence Street, Windfall, Indiana 46076  
Mailing Address: 908 North Independence Street, Windfall, IN 46076  
MSOP No.: M 159-25423-00010  
Facility: One (1) seed treater, identified as Treater 1  
Parameter: VOC usage  
Limit: Less than twenty-five (25.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

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

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (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: Monsanto Global Seed Company  
Source Address: 908 North Independence Street, Windfall, Indiana 46076  
Mailing Address: 908 North Independence Street, Windfall, IN 46076  
MSOP No.: M 159-25423-00010  
Facility: One (1) seed treater, identified as Treater 2  
Parameter: VOC usage  
Limit: Less than twenty-five (25.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

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

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (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: Monsanto Global Seed Company  
Source Address: 908 North Independence Street, Windfall, Indiana 46076  
Mailing Address: 908 North Independence Street, Windfall, IN 46076  
MSOP No.: M 159-25423-00010  
Facilities: Entire Source  
Parameter: Soybean Throughput  
Limit: Less than 5,000,000 bushels per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Soybean Throughput (tons)	Soybean Throughput (tons)	Soybean 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

### Technical Support Document (TSD) for a Significant Permit Revision to a Minor Source Operating Permit (MSOP)

#### Source Description and Location

<b>Source Name:</b>	<b>Monsanto Global Seed Company</b>
<b>Source Location:</b>	<b>908 North Independence Street, Windfall, Indiana 46076</b>
<b>County:</b>	<b>Tipton</b>
<b>SIC Code:</b>	<b>0723</b>
<b>Operation Permit No.:</b>	<b>M159-25423-00010</b>
<b>Operation Permit Issuance Date:</b>	<b>June, 4, 2008</b>
<b>Significant Permit Revision No.:</b>	<b>159-27714-00010</b>
<b>Permit Reviewer:</b>	<b>Sarah Conner, Ph. D.</b>

On April 2, 2009, the Office of Air Quality (OAQ) received an application from Monsanto Global Seed Company related to a modification to an existing soybean seed processing plant.

#### Existing Approvals

The source was issued MSOP Renewal No. M159-25423-00010 on June 4, 2008. The source has not received any approvals since this issuance of MSOP Renewal No. M159-25423-00010.

#### County Attainment Status

The source is located in Tipton County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, 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**  
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. Tipton 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**  
Tipton 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**  
 Tipton County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) 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, Emission Offset, and Part 70 Permit applicability.

**Status of the Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Soybean Receiving Pit	13.8	3.07	3.07	-	-	-	-	-	-
Internal Handling	8.02	4.47	4.47	-	-	-	-	-	-
Cleaners	98.55	24.64	24.64	-	-	-	-	-	-
Gravity Tables	98.55	24.64	24.64	-	-	-	-	-	-
Color Sorters	10.00	5.58	5.58	-	-	-	-	-	-
Soybean Packaging	1.84	1.84	1.84	-	-	-	-	-	-
Aspirator	3.94	3.94	3.94	-	-	-	-	-	-
Storage Bins	3.29	0.83	0.83	-	-	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>237.99</b>	<b>69.01</b>	<b>69.01</b>						
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	NA	NA

negl. = negligible

These emissions are based upon uncontrolled PTE of the source in MSOP Renewal No. M159-25423-00010, issued on June 4, 2008.

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Monsanto Global Seed Company on April 2, 2009, relating to the construction of two (2) new seed treaters that will vent to the existing dust collector 8A which will be relocated, and the construction of (2) new surge bins that will vent to the existing dust collector 9A.

The following is a list of the new emission units:

- (a) Two (2) seed treaters, identified as Treater 1 and Treater 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.
- (b) Two (2) surge bins, identified as Surge Bin1 and Surge Bin 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 9A as a control, and exhausting to stack 9A which vents inside the building.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – MSOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Surge Bins	3.29	0.83	0.14	-	-	-	-	-	-
Seed Treaters	8.02	4.47	0.76	-	-	48.59	-	0.77	0.68 (Methyl Alcohol)
Total PTE of Proposed Revision	11.31	5.30	0.90	0.00	0.00	48.59	0.00	0.77	0.68 (Methyl Alcohol)
negl. = negligible									
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

This MSOP is being revised through a MSOP Significant Permit Revision pursuant to 326 IAC 2-6.1-6(i)(1)(E)(iv) because the revision involves the construction of emission units with potential to emit (PTE) pollutant VOC greater than 25 tons per year.

**PTE of the Entire Source After Issuance of the MSOP Revision**

The table below summarizes the potential to emit of the entire source, with updated emissions from existing units based on more accurate emission factors, and reflecting all limits of the emission units. The updated and new emissions are shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
*Soybean Receiving Pit	<del>13.8</del> <b>2.63</b>	<del>3.07</del> <b>0.59</b>	<del>3.07</del> <b>0.10</b>	-	-	-	-	-	-
*Internal Handling	<del>8.02</del> <b>4.58</b>	<del>4.47</del> <b>2.55</b>	<del>4.47</del> <b>0.44</b>	-	-	-	-	-	-
*Cleaners	<del>98.55</del> <b>56.25</b>	<del>24.64</del> <b>14.25</b>	<del>24.64</del> <b>2.40</b>	-	-	-	-	-	-
*Gravity Tables	<del>98.55</del> <b>56.25</b>	<del>24.64</del> <b>14.25</b>	<del>24.64</del> <b>2.40</b>	-	-	-	-	-	-
*Color Sorters	<del>10.00</del> <b>13.73</b>	<del>5.58</del> <b>7.65</b>	<del>5.58</del> <b>1.31</b>	-	-	-	-	-	-
*Soybean Packaging	<del>1.84</del> <b>4.58</b>	<del>1.84</del> <b>2.55</b>	<del>1.84</del> <b>0.44</b>	-	-	-	-	-	-
*Aspirator	<del>3.94</del> <b>2.25</b>	<del>3.94</del> <b>2.25</b>	<del>3.94</del> <b>2.25</b>	-	-	-	-	-	-
*Storage Bins	<del>3.29</del> <b>1.88</b>	<del>0.83</del> <b>0.47</b>	<del>0.83</del> <b>0.08</b>	-	-	-	-	-	-
<b>*Surge Bins</b>	<b>1.88</b>	<b>0.47</b>	<b>0.08</b>	-	-	-	-	-	-
<b>*Seed Treaters</b>	<b>4.58</b>	<b>2.55</b>	<b>0.44</b>	-	-	<b>&lt;50.0</b>	-	<b>0.77</b>	<b>0.68 (Methyl Alcohol)</b>
Total PTE of Entire Source	<del>237.99</del> <b>148.58</b>	<del>69.01</del> <b>47.58</b>	<del>69.01</del> <b>9.92</b>	-	-	<b>&lt;50.0</b>	-	<b>0.77</b>	<b>0.68 (Methyl Alcohol)</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	NA	NA
negl. = negligible <b>*In order to render the requirements of 326 IAC 2-2 ((Prevention of Significant Deterioration (PSD)) not applicable, the soybean plant shall be limited to a throughput of less than 5,000,000 bushels per 12 consecutive month period.</b>									

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Soybean Receiving Pit	2.63	0.59	0.10	-	-	-	-	-	-
Internal Handling	4.58	2.55	0.44	-	-	-	-	-	-
Cleaners	56.25	14.25	2.40	-	-	-	-	-	-
Gravity Tables	56.25	14.25	2.40	-	-	-	-	-	-
Color Sorters	13.73	7.65	1.31	-	-	-	-	-	-
Soybean Packaging	4.58	2.55	0.44	-	-	-	-	-	-
Aspirator	2.25	2.25	2.25	-	-	-	-	-	-
Storage Bins	1.88	0.47	0.08	-	-	-	-	-	-
Surge Bins	1.88	0.47	0.08	-	-	-	-	-	-
Seed Treaters	4.58	2.55	0.44	-	-	<50.0	-	0.77	0.68 (Methyl Alcohol)
<b>Total PTE of Entire Source</b>	<b>148.58</b>	<b>47.58</b>	<b>9.92</b>	-	-	<b>&lt;50.0</b>	-	<b>0.77</b>	<b>0.68 (Methyl Alcohol)</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	NA	NA
negl. = negligible *In order to render the requirements of 326 IAC 2-2 ((Prevention of Significant Deterioration (PSD)), the soybean plant shall be limited to a throughput of less than 5,000,000 bushels per 12 consecutive month period.									

**MSOP Status**

This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
---

The following state rules are applicable to the proposed revision:

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

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

This modification to an existing PSD minor stationary source will increase the potential to emit particulate emissions to greater than 250 tons per year. However, the source, which is not one of the twenty-eight (28) listed source categories specified in 326 IAC 2-2-1(gg)(1), has agreed to limit particulate emissions in order to remain a PSD minor stationary source. In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following:

- (a) The existing soybean seed processing plant shall be limited to a throughput of less than 5,000,000 bushels (150,000 tons) of soybeans per 12 consecutive month period.
- (b) Particulate Matter (PM) emissions for each of the soybean seed processing facilities shall be limited as follows:

Emission Units	<sup>1</sup> Limited Soybean Throughput (tons/yr)	<sup>2</sup> PM Emission Limit (lbs PM / ton Soybeans)	<sup>3</sup> Limited PM Emissions (tons/yr)
Soybean receiving pit (1E)	150,000	0.035	2.63
Internal Handling	150,000	0.061	4.58
Cleaners (3E)	150,000	0.750	56.25
Color sorters (9EA, 9EB, and 9EC)	150,000	0.061	13.73
Gravity tables (5E, 6E, and 7E)	150,000	0.750	56.25
Aspirators (2E)	150,000	0.030	2.25
Storage bins	150,000	0.025	1.88
Packaging Tower	150,000	0.061	4.58
Seed Treaters	150,000	0.061	4.58
Surge Bins	150,000	0.025	1.88

<sup>1</sup> Equivalent to 5,000,000 bushels of soybeans a year

<sup>2</sup> PM Emission Limit factors are AP-42 emission factors from Chapter 9.9.1

<sup>3</sup> Limited PM Emissions are show in the Appendix A

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

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

The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the two (2) seed treaters 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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

Grain Elevator Operations

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 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) <sup>1</sup> 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)
Receiving Pit	3,000	90.00	50.23	3.15
Cleaners (2) (per cleaner)	500	15.00	25.16	11.25
Each of Color Sorters 9EA and 9EB	500	15.00	25.16	0.92
Gravity Tables (3) (per gravity table)	333	10.00	19.18	7.50
Packaging	1,000	30.00	40.04	1.83
Aspirators	1,000	30.00	40.04	0.90
Storage Bins	1,000	30.00	40.04	0.75
Seed Treaters	500	15	25.16	0.92

Based on calculations, control devices are not needed to comply with these limits.

The two (2) surge bins and the color sorter 9EC have potential particulate emissions less than 0.551 lbs per hour. Therefore, pursuant to 326 IAC 6-3-1(14), the surge bins and color sorter 9EC are not subject to the requirements of 326 IAC 6-3.

Seed Treaters

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

- (a) The amount of VOC delivered to Treater 1, shall be less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, including coatings, dilution solvents, and cleaning solvents.
- (b) The amount of VOC delivered to Treater 2, shall be less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, including coatings, dilution solvents, and cleaning solvents.

Compliance with these limits shall render the requirements of 326 IAC 8-1-6 (New Facilities; VOC Reduction Requirements) not applicable.

There are no other 326 IAC 8 Rules that are applicable to the two (2) seed treaters.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
--

- (a) There are no compliance determination and monitoring requirements applicable to this proposed revision.
- (b) The source has agreed to test in order to establish a more accurate lb VOC per gallon of coating used in the two (2) seed treaters and to provide those results with IDEM once they are available for this proposed revision.

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: 159-25423-00010, issued on June 4, 2008.

### Proposed Changes

Due to the addition of new emission units at the source, some of the descriptive information regarding the existing emission units has been updated.

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold text**:

#### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) soybean receiving pit, ~~(identified as 1E)~~, constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using baghouse 9A **asfor particulate** control, and exhausting to stack 9A ~~and~~ **which vents** inside the building.
- (b) Two (2) cleaners, ~~(identified as 3E)~~, constructed prior to 1978, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using a baghouse ~~(identified as 9A)~~ **asfor particulate** control, and exhausting to stack 9A ~~and~~ **which vents** inside the building.
- (c) Two (2) color sorters, identified as 9EA and 9EB, constructed in 2006, each with a maximum capacity of 15 tons of soybean seeds per hour, using baghouse 9A **asfor particulate** control, and exhausting to stack 9A ~~and~~ **which vents** inside the building.
- (d) One (1) color sorter, identified as 9EC, constructed in 2006, with a maximum capacity of 7.5 tons of soybean seeds per hour, using baghouse 9A **asfor particulate** control, and exhausting to stack 9A ~~and~~ **which vents** inside the building.
- (e) Three (3) gravity tables, ~~(identified as 5E, 6E and 7E)~~, constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones, ~~(identified as 5A, 6A, 7A)~~ as controls, and exhausting to stacks 5A, 6A and 7A.
- (f) Two (2) aspirators, ~~(identified as 2E)~~, constructed prior to 1978, with a maximum combined aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 9A **asfor particulate** control, and exhausting to stack 9A ~~and~~ **which vents** inside the building.
- ~~(g) One (1) baghouse (identified as baghouse 8A), constructed September 20, 2000, venting otherwise fugitive emissions from storage bins, scales, conveyors, mini-bulk bagging system, bulk bagging system, and bag filters located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.~~
- (hg) Four (4) storage bins, **identified as Storage Bins, constructed in 2005**, each with a maximum grain storage capacity of one thousand (1,000) bushels, **using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.** ~~controlled by one (1) baghouse with a control efficiency of 99% and a maximum gas flow rate of five hundred (500) actual cubic feet per minute (acfm).~~

- (h) **One (1) seed packaging area, identified as Packaging Tower, consisting of storage bins, scales, conveyors, mini-bulk bagging system, bulk bagging system and bag filters, constructed in 1992, with a maximum throughput of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.**
- (i) **Two (2) seed treaters, identified as Treater 1 and Treater 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.**
- (j) **Two (2) surge bins, identified as Surge Bin1 and Surge Bin 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.**
- (ik) Fugitive emissions from paved/unpaved roads and lots.

...

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

...

##### Emissions Unit Description:

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

- (f) Two (2) aspirators, ~~(identified as 2E)~~, constructed prior to 1978, with a maximum combined aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 9A ~~as for particulate control~~, and exhausting to stack 9A ~~and which vents inside the building~~.
- ~~(g) One (1) baghouse (identified as baghouse 8A), constructed September 20, 2000, venting otherwise fugitive emissions from storage bins, scales, conveyors, mini bulk bagging system, bulk bagging system, and bag filters located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.~~
- ~~(hg) Four (4) storage bins, identified as Storage Bins, constructed in 2005, each with a maximum grain storage capacity of one thousand (1,000) bushels, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building. controlled by one (1) baghouse with a control efficiency of 99% and a maximum gas flow rate of five hundred (500) actual cubic feet per minute (acfm).~~
- (h) **One (1) seed packaging area, identified as Packaging Tower, consisting of storage bins, scales, conveyors, mini-bulk bagging system, bulk bagging system and bag filters, constructed in 1992, with a maximum throughput of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.**
- (i) **Two (2) seed treaters, identified as Treater 1 and Treater 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.**
- (j) **Two (2) surge bins, identified as Surge Bin1 and Surge Bin 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.**

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

D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

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

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

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

**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:**

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = 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:**

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

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

Facility	Process Weight (tons/hr) for each facility	Particulate Emission Limit (lbs/hr) for each facility
Receiving Pit	90	50.23
...	...	...
Color Sorter 9EC	7.5	15.82
...		
Seed treaters	15	25.16

**D.1.32 Preventive Maintenance Plans [326 IAC 1-6-3]**

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**D.1.3 VOC Limit [326 IAC 8-1-6]**

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- (a) The amount of VOC delivered to Treater 1, shall be less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, including coatings, dilution solvents, and cleaning solvents.
- (b) The amount of VOC delivered to Treater 2, shall be less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, including coatings, dilution solvents, and cleaning solvents.

Compliance with these limits shall render the requirements of 326 IAC 8-1-6 (New Facilities; VOC Reduction Requirements) not applicable.

**D.1.4 PSD Minor Limit [326 IAC 2-2]**

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In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following:

- (a) The existing soybean seed processing plant shall be limited to a throughput of less than 5,000,000 bushels (150,000 tons) of soybeans per 12 consecutive month period.
- (b) Particulate Matter (PM) emissions for each of the soybean seed processing facilities shall be limited as follows:

Emission Units	Limited Soybean Throughput (tons/yr)	PM Emission Limit (lbs PM / ton Soybeans)	Limited PM Emissions (tons/yr)
Soybean receiving pit (1E)	150,000	0.035	2.63
Internal Handling	150,000	0.061	4.58
Cleaners (3E)	150,000	0.750	56.25
Color sorters (9EA, 9EB, and 9EC)	150,000	0.061	13.73
Gravity tables (5E, 6E, and 7E)	150,000	0.750	56.25
Aspirators (2E)	150,000	0.030	2.25
Storage bins	150,000	0.025	1.88
Packaging Tower	150,000	0.061	4.58
Seed Treaters	150,000	0.061	4.58
Surge Bins	150,000	0.025	1.88

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

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

- ~~(a) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the cyclones and baghouses for particulate control shall be in operation and control emissions from the soybean seed processing facilities at all times these facilities are in operation.~~
- ~~(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]~~

~~Compliance with the VOC usage limit contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets, or by determining the VOC content using an alternate method approved by IDEM, Compliance and Enforcement Branch (CEB). IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

~~D.1.5 Visible Emissions Notations~~

- ~~(a) Visible emission notations of the soybean seed processing facilities stack exhausts from stacks 5A, 6A and 7A shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) Visible emission notations of the stack exhaust from stack 9A shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

- ~~\_\_\_\_\_ (d) \_\_\_\_\_ In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~\_\_\_\_\_ (e) \_\_\_\_\_ A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(f) \_\_\_\_\_ If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a violation of this permit.~~

#### ~~D.1.6 Parametric Monitoring~~

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

#### ~~D.1.7 Baghouse Inspections~~

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

#### ~~D.1.8 Cyclone Inspections~~

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

#### ~~D.1.9 Broken or Failed Bag Detection~~

---

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

#### D.1.10 Cyclone Failure Detection

~~In the event that cyclone failure has been observed:~~

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

#### D.1.146 Record Keeping Requirement

**(a) To document compliance with condition D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.3.**

**(1) The VOC content of each coating material and solvent used.**

**(2) The amount of coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

**(3) The total VOC usage for each month.**

**(b) To document compliance with Condition D.1.4, the Permittee shall maintain monthly records of the grain throughput for the entire source.**

~~(a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the soybean seed stack exhausts.~~

~~(b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the pressure drop for baghouse 9A during normal operation.~~

~~(c) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.8 and D.1.9 and the dates the vents are redirected.~~

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

#### D.1.7 Reporting Requirements

**A quarterly summary of the information to document compliance with Conditions D.1.3 and D.1.4(a) 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).**

To show compliance with D.1.3 and D.1.4, Quarterly Report Forms were added and are shown on the following pages:

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

**MSOP Quarterly Report**

**Source Name:** Monsanto Global Seed Company  
**Source Address:** 908 North Independence Street, Windfall, Indiana 46076  
**Mailing Address:** 908 North Independence Street, Windfall, Indiana 46076  
**MSOP No.:** M 159-25423-00010  
**Facility:** One (1) seed treater, identified as Treater 1  
**Parameter:** VOC usage  
**Limit:** Less than twenty-five (25.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

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

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (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:** Monsanto Global Seed Company  
**Source Address:** 908 North Independence Street, Windfall, Indiana 46076  
**Mailing Address:** 908 North Independence Street, Windfall, Indiana 46076  
**MSOP No.:** M 159-25423-00010  
**Facility:** One (1) seed treater, identified as Treater 2  
**Parameter:** VOC usage  
**Limit:** Less than twenty-five (25.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

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

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (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:** Monsanto Global Seed Company  
**Source Address:** 908 North Independence Street, Windfall, Indiana 46076  
**Mailing Address:** 908 North Independence Street, Windfall, Indiana 46076  
**MSOP No.:** M 159-25423-00010  
**Facilities:** Entire Source  
**Parameter:** Soybean Throughput  
**Limit:** Less than 5,000,000 bushels per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Soybean Throughput (tons)	Soybean Throughput (tons)	Soybean 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.**

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

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

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

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

#### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 02, 2009.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision No. 159-27714-00010. The staff recommends to the Commissioner that this MSOP Significant Permit Revision be approved.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Sarah Conner, Ph. D. at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6555 or toll free at 1-800-451-6027 extension 4-6555.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**Appendix A: Emission Calculations  
Summary Calculations**

**Company Name:** Monsanto Global Seed Company  
**Address City IN Zip:** 908 N. Independence Drive, Windfall, IN 46076  
**Permit No:** 159-27714-00010  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** April 28, 2009

<b>Uncontrolled Potential Emissions (tons/year)</b>											
Pollutant	Soybean Receiving	Internal Handling	Cleaners	Aspirator	Gravity Tables	Color Sorters	Soybean Packaging	Storage Bins	Surge Bins	Seed Treaters	TOTAL
PM	13.80	8.02	98.55	3.94	98.55	8.02	8.02	3.29	3.29	8.02	<b>253.47</b>
PM10	3.07	4.47	24.97	3.94	24.97	4.47	4.47	0.83	0.83	4.47	<b>76.47</b>
PM2.5	0.51	0.76	4.20	3.94	4.20	0.76	0.76	0.14	0.14	0.76	<b>16.20</b>
SO2	-	-	-	-	-	-	-	-	-	-	<b>0.00</b>
NOx	-	-	-	-	-	-	-	-	-	-	<b>0.00</b>
VOC	-	-	-	-	-	-	-	-	-	51.20	<b>51.20</b>
CO	-	-	-	-	-	-	-	-	-	-	<b>0.00</b>
Worst Single HAP	-	-	-	-	-	-	-	-	-	0.68 (Methyl Alcohol)	<b>0.68 (Methyl Alcohol)</b>
total HAPs	-	-	-	-	-	-	-	-	-	0.77	<b>0.77</b>

<b>Limited Potential Emissions (tons/year)</b>											
Pollutant	Soybean Receiving	Internal Handling	Cleaners	Aspirator	Gravity Tables	Color Sorters	Soybean Packaging	Storage Bins	Surge Bins	<sup>1</sup> Seed Treaters	TOTAL
PM	2.63	4.58	56.25	2.25	56.25	13.73	4.58	1.88	1.88	4.58	<b>148.58</b>
PM10	0.59	2.55	14.25	2.25	14.25	7.65	2.55	0.47	0.47	2.55	<b>47.58</b>
PM2.5	0.10	0.44	2.40	2.25	2.40	1.31	0.44	0.08	0.08	0.44	<b>9.92</b>
SO2	-	-	-	-	-	-	-	-	-	-	<b>0.00</b>
NOx	-	-	-	-	-	-	-	-	-	-	<b>0.00</b>
VOC	-	-	-	-	-	-	-	-	-	<50.0	<b>&lt;50.0</b>
CO	-	-	-	-	-	-	-	-	-	-	<b>0.00</b>
Worst Single HAP	-	-	-	-	-	-	-	-	-	0.68 (Methyl Alcohol)	<b>0.68 (Methyl Alcohol)</b>
total HAPs	-	-	-	-	-	-	-	-	-	0.77	<b>0.77</b>

<b>Limited and Controlled Potential Emissions (tons/year)</b>											
Pollutant	Soybean Receiving	Internal Handling	Cleaners	Aspirator	Gravity Tables	Color Sorters	Soybean Packaging	Storage Bins	Surge Bins	<sup>1</sup> Seed Treaters	TOTAL
PM	0.026	0.458	0.563	0.023	5.625	0.137	0.046	0.019	0.019	0.046	6.96
PM10	0.006	0.255	0.143	0.023	1.425	0.077	0.026	0.005	0.005	0.026	1.99
PM2.5	0.001	0.044	0.024	0.023	0.240	0.013	0.004	0.001	0.001	0.004	0.35
SO2	-	-	-	-	-	-	-	-	-	-	0.00
NOx	-	-	-	-	-	-	-	-	-	-	0.00
VOC	-	-	-	-	-	-	-	-	-	<50.0	<50.0
CO	-	-	-	-	-	-	-	-	-	-	0.00
Worst Single HAP	-	-	-	-	-	-	-	-	-	0.68 (Methyl Alcohol)	0.68 (Methyl Alcohol)
total HAPs	-	-	-	-	-	-	-	-	-	0.77	0.77

Note 1: The source has agreed to limit the VOC emissions from each seed treater to less than 25.0 tons per year in order to avoid being subject to 326 IAC 8-1-6, because the PTE of VOC is based on assumptions that could not be verified by vendor sheets.

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

**Company Name:** Monsanto Global Seed Company  
**Address City IN Zip:** 908 N. Independence Drive, Windfall, IN 46076  
**Permit No:** 159-27714-00010  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** April 28, 2009

	Receiving Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	90	0.035	13.8	99%	0.14
<b>PM<sub>10</sub></b>	90	0.0078	3.07	99%	0.031
<b>PM<sub>2.5</sub></b>	90	0.0013	0.51	99%	0.005

\* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving by Hopper Truck, SCC 3-02-005-52). March 2003

**Methodology**

Uncontrolled PTE = Receiving capacity (tons/hr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs \*8760 hr/yr  
 Controlled PTE = uncontrolled PTE \* (1-control efficiency)

**Limited Particulate from Soybean Receiving Pit**

Grain	<sup>1</sup> bushels/year	<sup>2</sup> lbs / bushel	Grain Throughput (tons/year)
Wheat and Soybeans processed	5,000,000	60	150,000

Note 1: Total limited amount of grain received and shipped per year equals 5.0 MM bushels soybeans.

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

	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	150,000	0.035	2.6	99%	0.026
<b>PM<sub>10</sub></b>	150,000	0.0078	0.6	99%	0.006
<b>PM<sub>2.5</sub></b>	150,000	0.0013	0.1	99%	0.001

\* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving by Hopper Truck, SCC 3-02-005-52). March 2003

**Methodology**

Limited PTE = Limited Grain Throughput (tons/yr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs  
 Controlled PTE = uncontrolled PTE \* (1-control efficiency)

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

**Company Name:** Monsanto Global Seed Company  
**Address City IN Zip:** 908 N. Independence Drive, Windfall, IN 46076  
**Permit No:** 159-27714-00010  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** April 28, 2009

	Handling Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Cyclone Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	30	0.061	8.02	90%	0.802
<b>PM<sub>10</sub></b>	30	0.034	4.47	90%	0.447
<b>PM<sub>2.5</sub></b>	30	0.0058	0.76	90%	0.076

\* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

**Methodology**

Uncontrolled PTE = Handling capacity (tons/hr) \* PM emission factor (lbs/hr) \* 1 ton/2000 lbs \* 8760 hr/yr  
 Controlled PTE = uncontrolled PTE \* (1-control efficiency)

**Limited Particulate from Internal Handling**

	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Cyclone Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	150,000	0.061	4.58	90%	0.458
<b>PM<sub>10</sub></b>	150,000	0.034	2.55	90%	0.255
<b>PM<sub>2.5</sub></b>	150,000	0.0058	0.44	90%	0.044

\* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

**Methodology**

Limited PTE = Limited Grain Throughput (tons/yr) \* PM emission factor (lbs/hr) \* 1 ton/2000 lbs \* 8760 hr/yr  
 Controlled PTE = uncontrolled PTE \* (1-control efficiency)

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

**Company Name:** Monsanto Global Seed Company  
**Address City IN Zip:** 908 N. Independence Drive, Windfall, IN 46076  
**Permit No:** 159-27714-00010  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** April 28, 2009

	Cleaning Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	30	0.75	98.55	99%	0.99
<b>PM<sub>10</sub></b>	30	0.19	24.97	99%	0.25
<b>PM<sub>2.5</sub></b>	30	0.032	4.20	99%	0.04

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

**Methodology**

Uncontrolled PTE = Cleaning capacity (tons/hr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs \*8760 hr/yr  
 Controlled PTE = uncontrolled PTE \* (1-control efficiency)

**Limited Particulate from Cleaners**

	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	150,000	0.75	56.25	99%	0.56
<b>PM<sub>10</sub></b>	150,000	0.19	14.25	99%	0.14
<b>PM<sub>2.5</sub></b>	150,000	0.032	2.40	99%	0.02

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

Assume a cyclone control of 90% to get uncontrolled emission factors from AP-42. March 2003

**Methodology**

Limited PTE = Limited Grain Throughput (tons/yr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs \*8760 hr/yr  
 Controlled PTE = uncontrolled PTE \* (1-control efficiency)

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

**Company Name:** Monsanto Global Seed Company  
**Address City IN Zip:** 908 N. Independence Drive, Windfall, IN 46076  
**Permit No:** 159-27714-00010  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** April 28, 2009

	Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Cyclone Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	30	0.03	3.94	99%	0.04
<b>PM<sub>10</sub>**</b>	30	0.03	3.94	99%	0.04
<b>PM<sub>2.5</sub>**</b>	30	0.03	3.94	99%	0.04

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

\*\*\* Assume PM emissions = PM10 emissions = PM2.5 emissions

**Methodology**

Uncontrolled PTE = Capacity (tons/hr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs \*8760 hr/yr

Controlled PTE = uncontrolled PTE \* (1-control efficiency)

**Limited Particulate from Aspirator**

	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Cyclone Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	150,000	0.03	2.25	99%	0.02
<b>PM<sub>10</sub>**</b>	150,000	0.03	2.25	99%	0.02
<b>PM<sub>2.5</sub>**</b>	150,000	0.03	2.25	99%	0.02

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

\*\*\* Assume PM emissions = PM10 emissions = PM2.5 emissions

**Methodology**

Limited PTE = Limited Grain Throughput (tons/yr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs \*8760 hr/yr

Controlled PTE = uncontrolled PTE \* (1-control efficiency)

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

**Company Name:** Monsanto Global Seed Company  
**Address City IN Zip:** 908 N. Independence Drive, Windfall, IN 46076  
**Permit No:** 159-27714-00010  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** April 28, 2009

	Sorting Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Cyclone Control Efficiency***	PTE After Controls (tons/yr)
<b>PM</b>	30	0.75	98.55	90%	9.86
<b>PM<sub>10</sub></b>	30	0.19	24.97	90%	2.50
<b>PM<sub>2.5</sub></b>	30	0.032	4.20	90%	0.42

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

**Methodology**

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

Controlled PTE = uncontrolled PTE \* (1-control efficiency)

**Limited Particulate from Gravity Tables**

	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Cyclone Control Efficiency***	PTE After Controls (tons/yr)
<b>PM</b>	150,000	0.75	56.25	90%	5.63
<b>PM<sub>10</sub></b>	150,000	0.19	14.25	90%	1.43
<b>PM<sub>2.5</sub></b>	150,000	0.032	2.40	90%	0.24

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

Assume a cyclone control of 90% to get uncontrolled emission factors from AP-42. March 2003

**Methodology**

Limited PTE = Limited Grain Throughput (tons/yr) \* PM emission factor (lbs/hr) \* 1 ton/2000 lbs \* 8760 hr/yr

Controlled PTE = uncontrolled PTE \* (1-control efficiency)

**Appendix A: Emission Calculations  
Particulate from Color Sorters**

**Company Name:** Monsanto Global Seed Company  
**Address City IN Zip:** 908 N. Independence Drive, Windfall, IN 46076  
**Permit No:** 159-27714-00010  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** April 28, 2009

	Capacity of Sorters 9 EA and 9EB (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	15	0.061	8.02	99%	0.080
<b>PM<sub>10</sub></b>	15	0.034	4.47	99%	0.045
<b>PM<sub>2.5</sub></b>	15	0.0058	0.76	99%	0.008

\* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

**Methodology**

Uncontrolled PTE = Handling capacity (tons/hr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs \*8760 hr/yr  
 Controlled PTE = uncontrolled PTE \* (1-control efficiency)

	Capacity of Sorter 9 EC (tons/hr)	Emission Factor* (lbs/ton)	Before Controls (tons/yr)	Baghouse Control Efficiency	After Controls (tons/yr)
<b>PM</b>	7.5	0.061	2.00	99%	0.020
<b>PM<sub>10</sub></b>	7.5	0.034	1.12	99%	0.011
<b>PM<sub>2.5</sub></b>	7.5	0.0058	0.19	99%	0.002

\* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

**Methodology**

Uncontrolled PTE = Handling capacity (tons/hr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs \*8760 hr/yr  
 Controlled PTE = uncontrolled PTE \* (1-control efficiency)

**Limited Particulate from Color Sorters**

	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	150,000	0.061	13.73	99%	0.137
<b>PM<sub>10</sub></b>	150,000	0.034	7.65	99%	0.077
<b>PM<sub>2.5</sub></b>	150,000	0.0058	1.31	99%	0.013

\* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

**Methodology**

Limited PTE = Limited Grain Throughput (tons/yr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs \*8760 hr/yr  
 Controlled PTE = uncontrolled PTE \* (1-control efficiency)

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

**Company Name:** Monsanto Global Seed Company  
**Address City IN Zip:** 908 N. Independence Drive, Windfall, IN 46076  
**Permit No:** 159-27714-00010  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** April 28, 2009

	Packaging Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Baghouse Control Efficiency	After Controls (tons/yr)
<b>PM</b>	30	0.061	8.02	99%	0.08
<b>PM<sub>10</sub></b>	30	0.034	4.47	99%	0.04
<b>PM<sub>2.5</sub></b>	30	0.0058	0.76	99%	0.01

\* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

**Methodology**

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

Controlled PTE = uncontrolled PTE \* (1-control efficiency)

**Limited Particulate from Packaging**

	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Baghouse Control Efficiency	After Controls (tons/yr)
<b>PM</b>	150,000	0.061	4.58	99%	0.05
<b>PM<sub>10</sub></b>	150,000	0.034	2.55	99%	0.03
<b>PM<sub>2.5</sub></b>	150,000	0.0058	0.44	99%	0.00

\* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

**Methodology**

Limited PTE = Limited Grain Throughput (tons/yr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs \*8760 hr/yr

Controlled PTE = uncontrolled PTE \* (1-control efficiency)

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

**Company Name:** Monsanto Global Seed Company  
**Address City IN Zip:** 908 N. Independence Drive, Windfall, IN 46076  
**Permit No:** 159-27714-00010  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** April 28, 2009

	Maximum Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	30	0.025	3.29	99%	0.033
<b>PM<sub>10</sub></b>	30	0.0063	0.83	99%	0.008
<b>PM<sub>2.5</sub></b>	30	0.0011	0.14	99%	0.001

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

**Methodology**

Uncontrolled PTE = Maximum capacity (tons/hr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs \*8760 hr/yr  
 Controlled PTE = uncontrolled PTE \* (1-control efficiency)

**Limited Particulate from Storage Bins**

	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	150,000	0.025	1.88	99%	0.019
<b>PM<sub>10</sub></b>	150,000	0.0063	0.47	99%	0.005
<b>PM<sub>2.5</sub></b>	150,000	0.0011	0.08	99%	0.001

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

**Methodology**

Limited PTE = Limited Grain Throughput (tons/yr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs \*8760 hr/yr  
 Controlled PTE = uncontrolled PTE \* (1-control efficiency)

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

**Company Name:** Monsanto Global Seed Company  
**Address City IN Zip:** 908 N. Independence Drive, Windfall, IN 46076  
**Permit No:** 159-27714-00010  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** April 28, 2009

Pollutant	Maximum Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	30	0.025	3.29	99%	0.033
<b>PM<sub>10</sub></b>	30	0.0063	0.83	99%	0.008
<b>PM<sub>2.5</sub></b>	30	0.0011	0.14	99%	0.001

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

**Methodology**

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

Controlled PTE = uncontrolled PTE \* (1-control efficiency)

**Limited Particulate from Surge Bins**

Pollutant	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	150,000	0.025	1.88	99%	0.019
<b>PM<sub>10</sub></b>	150,000	0.0063	0.47	99%	0.005
<b>PM<sub>2.5</sub></b>	150,000	0.0011	0.08	99%	0.001

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

**Methodology**

Limited PTE = Limited Grain Throughput (tons/yr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs \*8760 hr/yr

Controlled PTE = uncontrolled PTE \* (1-control efficiency)

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

**Company Name:** Monsanto Global Seed Company  
**Address City IN Zip:** 908 N. Independence Drive, Windfall, IN 46076  
**Permit No:** 159-27714-00010  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** April 28, 2009

	Treating Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	30	0.061	8.02	99%	0.080
<b>PM<sub>10</sub></b>	30	0.034	4.47	99%	0.045
<b>PM<sub>2.5</sub></b>	30	0.0058	0.76	99%	0.008

\* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

**Methodology**

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

Controlled PTE = uncontrolled PTE \* (1-control efficiency)

**Limited Particulate from Treating**

	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
<b>PM</b>	150,000	0.061	4.58	99%	0.046
<b>PM<sub>10</sub></b>	150,000	0.034	2.55	99%	0.026
<b>PM<sub>2.5</sub></b>	150,000	0.0058	0.44	99%	0.004

\* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

**Methodology**

Limited PTE = Limited Grain Throughput (tons/yr)\* PM emission factor (lbs/hr)\* 1 ton/2000 lbs \*8760 hr/yr

Controlled PTE = uncontrolled PTE \* (1-control efficiency)

**Appendix A: Emissions Calculations  
Seed Treaters - VOC PTE**

**Company Name:** Monsanto Global Seed Company  
**Address City IN Zip:** 908 N. Independence Drive, Windfall, IN 46076  
**Permit No:** 159-27714-00010  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** April 28, 2009

ctw = 100 lbs  
gallons / oz = 0.0078125 gal  
lbs / bu = 60 lbs  
ctw = 1,667 bu  
Throughput = 1000 bu/hr (throughput of both treaters together)

Seed Additive	Constituent	% by Weight	Density (lb/gal)	<sup>1</sup> VOC Content (lb VOC /gal. of coating)	Maximum Throughput (tons seed/yr)	<sup>2</sup> Application Rate OZ (oz of treatment / ctw)	Application Rate OZ (oz of treatment / tons)	Annual Capacity (gal/year)	Uncontrolled VOC PTE (tons/yr)	Uncontrolled HAP PTE (tons/yr)
Allegiance FL (Metalaxyl)	VOC	7.5%	9.2	0.69	262,800	0.8	16	32,850	11.33	-
Diamir (VOC)	VOC	11.0%	9.1	1.00	262,800	0.4	8	16,425	8.22	-
Diamir (Toluene)	HAP	0.1%	9.1	0.01	262,800	0.4	8	16,425	-	0.07
Gaucho 600	VOC	7.5%	10.3	0.77	262,800	1.6	32	65,700	25.38	-
N-Hibit Gold CST(Harpin)	VOC	0.0%	3.9	0.00	262,800	.25 oz./ ctw*	-	-	-	-
<sup>3</sup> Custom Color Orange	VOC	1.0%	11.0	0.11	262,800	2.4	48	98,550	5.42	-
<sup>3</sup> Color Film Clear	VOC	5.0%	8.3	0.42	262,800	0.1	2	4,106	0.85	-
Color Film Clear (Methyl Alcohol)	HAP	4.0%	8.3	0.33	262,800	0.1	2	4,106	-	0.68
Color Film Clear (Formaldehyde)	HAP	0.05%	8.3	0.00	262,800	0.1	2	4,106	-	0.01
<sup>4</sup> Limited total PTE in tons/yr									<b>51.20</b>	<b>0.77</b>
									<b>&lt;50.0</b>	

\* N-Hibit is a wettable dry granule

Methods:

Note 1. VOC content in lb VOC per gallon of coating was not given based on MSDS sheets. Therefore the lb VOC/gal of coating was estimated based on MSDS sheets, or similar materials where the lb VOC/gal of coating was provided.

Note 2. Application Rate provided by source

Note 3: Vender memorandum for Custom color orange estimates the VOC content at less than 1% and for Color Film Clear at less than 5%.

Note 4: The source has agreed to limit the VOC emissions from each seed treater to less than 25.0 tons per year in order to avoid being subject to 326 IAC 8-1-6, because the PTE of VOC is based on assumptions that could not be verified by vendor sheets.

Emission factor = Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Annual Capacity in tons/year = Grain Throughput in tons/year.

Annual Capacity in gal/year = Annual capacity in tons/year \* seed additive usage in ounce/ton \* (1 gal / 128 ounces)

Potential VOC or HAP Emissions in Tons per Year = (1 ton/2000 lbs) = Annual Capacity in gal/year \* Emission factor in lb/gal \* (1 ton /2000 lbs)



# 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:** Craig Weitbrecht  
Monsanto Global Seed Company  
908 N Independence St  
Windfall, IN 46076

**DATE:** July 1, 2009

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

**SUBJECT:** Final Decision  
First Significant Revision  
159-27714-00010

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:  
Janice Hotz - North American Soybean Production Lead  
David Jordan - Environmental Resources Management (ERM)  
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  
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(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

July 1, 2009

TO: Windfall Branch - Tipton 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: Monsanto Global Seed Company**  
**Permit Number: 159-27714-00010**

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	GHOTOPP 7/1/2009 Monsanto Global Seed Company 159-27714-00010 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Craig Weitbrecht Monsanto Global Seed Company 908 N Independence St Windfall IN 46076 (Source CAATS) via confirmed delivery										
2		Janice Hotz North American Soybean Production Lead Monsanto Global Seed Company 908 N Independence St Windfall IN 46076 (RO CAATS)										
3		Shelly & J. Acres 1280 S 400 W Tipton IN 46072 (Affected Party)										
4		Ms. Jane Harper 285 W 100 N Tipton IN 46072 (Affected Party)										
5		Tipton County Commissioners 101 East Jefferson Street Tipton IN 46072 (Local Official)										
6		Tipton County Health Department 1000 S. Main St Tipton IN 46072-1901 (Health Department)										
7		David Jordan Environmental Resources Management (ERM) 11350 North Meridian, Ste. 220 Carmel IN 46032 (Consultant)										
8		Windfall Town Council P.O. Box 486 Windfall IN 46076 (Local Official)										
9		Windfall Branch - Tipton County Public Library 109 McClellan Street Windfall IN 46076 (Library)										
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