



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: June 12, 2009

RE: Consolidated Grain & Barge Company / 029-27966-00024

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



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Scott Perkins
Consolidated Grain & Barge Company
210 George Street
Aurora, Indiana 47001

June 12, 2009

Re: 029-27966-00024
Second Notice-Only Change to
M029-20284-00024

Dear Scott Perkins:

Consolidated Grain & Barge Company was issued a Minor Source Operating Permit (MSOP) No. M029-20284-00024 on February 28, 2005 for a stationary whole grain handling operation located at 210 George Street, Aurora, Indiana 47001. On May 21, 2009, the Office of Air Quality (OAQ) received an application from the source relating to the construction and operation of a grain conveyor system that is of the same type as the other permitted oversize product conveyor system. The new grain conveyor system will comply with the same applicable requirements and permit terms and conditions as the oversize product conveyor system, but will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3. The uncontrolled/unlimited potential to emit of the entire source will continue to be less than the threshold levels specified in 326 IAC 2-7 (see attached calculations). The addition of the new grain conveyor system to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(13). Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby revised as follows with the deleted language as ~~strikeouts~~ and new language **bolded**.

The following description has been added to Sections A.2 and D.1 as follows:

-
- (y) **One (1) grain conveyor system, approved for constructed in 2009, consisting of the following:**
- (1) **One (1) hopper with belt feeder, identified as SCC-1, with a maximum throughput of 300 tons per hour.**
 - (2) **Four (4) grain conveyors, identified as Conveyors #1 through #4, with a maximum throughput of 300 tons per hour, each.**
 - (3) **One (1) barge conveyor, identified as Barge Conveyor #5, with a maximum throughput of 300 tons per hour.**

Condition D.1.2 has been revised as follows:

D.1.2 Particulate Matter Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from each facility used for grain receiving, handling, drying, storage, bin loading, and grain shipping, and the portable conveyor, **and the grain conveyor system** shall each not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

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

1. Several of IDEM's branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to "Permit Administration and Development Section" and the "Permits Branch" have been changed to "Permit Administration and Support Section". References to "Asbestos Section", "Compliance Data Section", "Air Compliance Section", and "Compliance Branch" have been changed to "Compliance and Enforcement Branch". The permit has been revised as follows:

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

2. The Compliance Data Branch facsimile number has been revised to 317-233-~~5967~~ **6865**.

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit. A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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

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 Anne-Marie C. Hart, of my staff, at 317-234-5174 or 1-800-451-6027, and ask for extension 4-5174.

Sincerely,



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

Attachments: Updated Permit and Updated Calculations

ACD/ACH

cc: File - Dearborn County
Dearborn 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 OFFICE OF AIR QUALITY

Consolidated Grain & Barge Company
210 George Street
Aurora, Indiana 47001

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units 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.

Operation Permit No.: MSOP 029-20284-00024	
Original Issued by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: February 28, 2005 Expiration Date: February 28, 2010

First Minor Permit Revision No.: 029-25121-00024
First Notice-Only Change No. 029-26217-00024

Issued on September 19, 2007
Issued on March 18, 2008

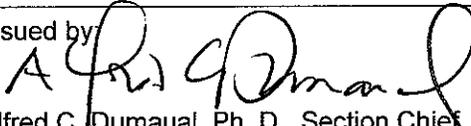
Second Notice-Only Change No. 029-27966-00024	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: June 12, 2009 Expiration Date: February 28, 2010

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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 whole grain handling operation.

Source Address:	210 George Street, Aurora, Indiana 47001
Mailing Address:	210 George Street, Aurora, Indiana 47001
General Source Phone:	(812) 926-0740
SIC Code:	5153
County Location:	Dearborn
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit
	Minor Source, under PSD
	Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) natural gas fired column grain dryer, rated at 12.0 million (MM) British thermal units (Btu) per hour, processing a maximum of 2,000 bushels of grain per hour, exhausting through stack S-3;
- (b) One (1) main grain dump shed (two sided) enclosing two (2) dump pits (Pits #1 and #2), with a maximum capacity of 1200 tons per hour, with a baghouse for particulate matter control, exhausting through stack S-1;
- (c) One (1) grain dump shed (two sided) enclosing one (1) dump pit (Pit # 3), with a maximum capacity of 600 tons per hour, controlled with baghouse for particulate matter, exhausting through stack S-2;
- (d) One (1) grain dump shed (two sided) enclosing one (1) dump pit (Pit # 4), with a maximum capacity of 450 tons per hour, controlled by choke feeding to control particulate matter;
- (e) Two (2) steel storage bins (ID Nos. 1 and 2), each with a storage capacity of 750 tons;
- (f) Two (2) steel storage bins (ID Nos. 3 and 4), each with a storage capacity of 750 tons;
- (g) Two (2) steel storage bins (ID Nos. 5 and 6), each with a storage capacity of 7560 tons;
- (h) One (1) steel storage bin (ID No. 7) with a storage capacity of 390 tons;
- (i) One (1) steel storage bin (ID No. 8) with a storage capacity of 18,403 tons;
- (j) Four (4) enclosed reclaim (belt, drag) conveyors with maximum capacity of 600 tons per hour;

- (k) Eight (8) enclosed bin fill spouts with maximum capacity of 600 tons per hour;
- (l) (Five) (5) enclosed bin fill conveyors with maximum capacity of 600 tons per hour;
- (m) Two (2) enclosed distributors with maximum capacity of 600 tons per hour;
- (n) Three (3) enclosed bucket elevator(s) with maximum capacity of 900 tons per hour;
- (o) One (1) enclosed wet grain bucket elevator with maximum capacity of 150 tons per hour;
- (p) One (1) enclosed dry grain bucket elevator with maximum capacity of 150 tons per hour;
- (q) One (1) enclosed railcar loading spout with a maximum capacity of 540 tons per hour;
- (r) One (1) enclosed telescoping barge loading spout with a maximum capacity of 1200 tons per hour;
- (s) One (1) 3 cubic yard clamshell bucket crane with maximum capacity of 300 tons per hour for unloading bulk product barges and direct loading of trucks;
- (t) One (1) covered barge loading belt with a maximum capacity of 1200 tons per hour;
- (u) One (1) covered barge loading belt with a maximum capacity of 450 tons per hour;
- (v) One (1) covered truck load out belt with a maximum capacity of 170 tons per hour; and
- (w) One (1) truck load out spout with a maximum capacity of 340 tons per hour.
- (x) One (1) portable conveyor for moving petroleum coke and oversize product, from trucks to storages and then to barges, approved for construction in 2007, with a maximum capacity of 300 tons of materials per hour.
- (y) One (1) grain conveyor system, approved for constructed in 2009, consisting of the following:
 - (1) One (1) hopper with belt feeder, identified as SCC-1, with a maximum throughput of 300 tons per hour.
 - (2) Four (4) grain conveyors, identified as Conveyors #1 through #4, with a maximum throughput of 300 tons per hour, each.
 - (3) One (1) barge conveyor, identified as Barge Conveyor #5, with a maximum throughput of 300 tons per hour.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate 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.

B.2 Definitions

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.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, MSOP 029-20284-00024, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted 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) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

- (d) 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.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's 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 PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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.

- (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)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.9 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] [IC13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permit Administration and Support Section, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ shall issue a revised permit.

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

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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 Fugitive Dust Emissions [326 IAC 6-4]

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

C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 2-7-1(34).

- (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

C.5 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance 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.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.6 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements

C.7 Compliance Monitoring [326 IAC 2-1.1-11]

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

C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

C.9 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

- (a) Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.10 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this

permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit 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 re-testing in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

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

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1

EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) natural gas fired column grain dryer, rated at 12.0 million (MM) British thermal units (Btu) per hour, processing a maximum of 2,000 bushels of grain per hour, exhausting through stack S-3;
- (b) One (1) main grain dump shed (two sided) enclosing two (2) dump pits (Pits #1 and #2), with a maximum capacity of 1200 tons per hour, with a baghouse for particulate matter control, exhausting through stack S-1;
- (c) One (1) grain dump shed (two sided) enclosing one (1) dump pit (Pit # 3), with a maximum capacity of 600 tons per hour, controlled with baghouse for particulate matter, exhausting through stack S-2;
- (d) One (1) grain dump shed (two sided) enclosing one (1) dump pit (Pit # 4), with a maximum capacity of 450 tons per hour, controlled by choke feeding to control particulate matter;
- (e) Two (2) steel storage bins (ID Nos. 1 and 2), each with a storage capacity of 750 tons;
- (f) Two (2) steel storage bins (ID Nos. 3 and 4), each with a storage capacity of 750 tons;
- (g) Two (2) steel storage bins (ID Nos. 5 and 6), each with a storage capacity of 7560 tons;
- (h) One (1) steel storage bin (ID No. 7) with a storage capacity of 390 tons;
- (i) One (1) steel storage bin (ID No. 8) with a storage capacity of 18,403 tons;
- (j) Four (4) enclosed reclaim (belt, drag) conveyors with maximum capacity of 600 tons per hour;
- (k) Eight (8) enclosed bin fill spouts with maximum capacity of 600 tons per hour;
- (l) (Five) (5) enclosed bin fill conveyors with maximum capacity of 600 tons per hour;
- (m) Two (2) enclosed distributors with maximum capacity of 600 tons per hour;
- (n) Three (3) enclosed bucket elevator(s) with maximum capacity of 900 tons per hour;
- (o) One (1) enclosed wet grain bucket elevator with maximum capacity of 150 tons per hour;
- (p) One (1) enclosed dry grain bucket elevator with maximum capacity of 150 tons per hour;
- (q) One (1) enclosed railcar loading spout with a maximum capacity of 540 tons per hour;
- (r) One (1) enclosed telescoping barge loading spout with a maximum capacity of 1200 tons per hour;
- (s) One (1) 3 cubic yard clamshell bucket crane with maximum capacity of 300 tons per hour for unloading bulk product barges and direct loading of trucks;
- (t) One (1) covered barge loading belt with a maximum capacity of 1200 tons per hour;

- (u) One (1) covered barge loading belt with a maximum capacity of 450 tons per hour;
- (v) One (1) covered truck load out belt with a maximum capacity of 170 tons per hour; and
- (w) One (1) truck load out spout with a maximum capacity of 340 tons per hour.
- (x) One (1) portable conveyor for moving petroleum coke and oversize product, from trucks to storages and then to barges, approved for construction in 2007, with a maximum capacity of 300 tons of materials per hour.
- (y) One (1) grain conveyor system, approved for constructed in 2009, consisting of the following:
 - (1) One (1) hopper with belt feeder, identified as SCC-1, with a maximum throughput of 300 tons per hour.
 - (2) Four (4) grain conveyors, identified as Conveyors #1 through #4, with a maximum throughput of 300 tons per hour, each.
 - (3) One (1) barge conveyor, identified as Barge Conveyor #5, with a maximum throughput of 300 tons per hour.

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

Emission Limitations and Standards

D.1.1 Nonattainment Area Limitations Except Lake County [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1-2(d)(2), the Permittee shall comply with the following:

- (a) The permittee shall provide for good housekeeping and maintenance procedures which is defined as those practices which would be followed by a prudent management in controlling, regulating, and maintaining clean and safe conditions of buildings and grounds. In particular, these practices are required to minimize the opportunity for particulate matter to become airborne and leave the property.
- (b) Good housekeeping practices shall be conducted in the following areas or operations:
 - (1) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floors, decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentration; and grain driers with respect to accumulated particulate matter.
 - (2) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.
 - (3) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (4) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
- (c) Good equipment maintenance will be those procedures, which eliminate or minimize emissions from equipment or a system caused by:

- (1) Malfunctions.
 - (2) Breakdowns.
 - (3) Improper adjustment.
 - (4) Operation above rated or designed capacity.
 - (5) Not following designed operating specifications.
 - (6) Lack of good preventive maintenance care.
 - (7) Lack of critical and proper spare replacement parts on hand.
 - (8) Lack of properly trained and experienced personnel.
- (d) To insure the above good housekeeping and maintenance procedures, emissions from the affected areas, operations, equipment and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

D.1.2 Particulate Matter Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from each facility used for grain receiving, handling, drying, storage, bin loading, and grain shipping, the portable conveyor, and the grain conveyor system shall each not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

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

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

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with condition D.1.2, the baghouses for particulate control shall be in operation and control emissions from the grain dump pits #1, #2 and #3 at all times that the grain dump pits #1, #2 and #3 are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Visible Emissions Notations

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

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the grain dump pits #1, #2 and #3, at least once per shift when the processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 2.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. 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 - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other 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

An inspection shall be performed each calendar quarter of all bags controlling the grain dump pits #1, #2 and #3 when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 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.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

Record Keeping and Reporting Requirement

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the baghouses stack exhaust once per shift.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.

- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7.
- (d) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Consolidated Grain & Barge Company
Address:	210 George Street
City:	Aurora, Indiana 47001
Phone #:	(812) 926-0740
MSOP #:	029-20284-00024

I hereby certify that Consolidated Grain & Barge Company is

- still in operation.
 no longer in operation.

I hereby certify that Consolidated Grain & Barge Company is

- in compliance with the requirements of MSOP **029-20284-00024**.
 not in compliance with the requirements of MSOP **029-20284-00024**.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/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 PERM 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: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

**Attachment A: Emissions Calculations
Emissions Summary**

Company Name: Consolidated Grain & Barge Company
Address City IN Zip: 210 George Street, Aurora, Indiana 47001
Permit Number: M029-20284-00024
Notice-Only Change Number: 029-27966-00024
Reviewer: Anne-Marie C. Hart
Date: June 9, 2009

PTE of Existing Source (Uncontrolled MSOP M029-20284-00024)

Process/Emission Unit	Tons/Year									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst-Case Individual HAP	
Grain Elevator	100.08	35.71	6.03	0.00	0.00	0.00	0.00	0.00	0.00	
Natural Gas Combustion	0.10	0.40	0.40	0.03	5.26	0.29	4.42	0.10	0.09	Hexane
Oversize Product Conveyor	7.00	3.31	0.50	0.00	0.00	0.00	0.00	0.00	0.00	
Unpaved Roads*	6.63	1.69	1.69	0.00	0.00	0.00	0.00	0.00	0.00	
Total	113.82	41.12	8.62	0.03	5.26	0.29	4.42	0.10	0.09	Hexane

PTE of Source After Revision (Uncontrolled)

Process/Emission Unit	Tons/Year									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst-Case Individual HAP	
Grain Elevator	100.08	35.71	6.03	0.00	0.00	0.00	0.00	0.00	0.00	
Natural Gas Combustion	0.10	0.40	0.40	0.03	5.26	0.29	4.42	0.10	0.09	Hexane
Oversize Product Conveyor	7.00	3.31	0.50	0.00	0.00	0.00	0.00	0.00	0.00	
Grain Conveyors*	19.84	7.36	7.36	0.00	0.00	0.00	0.00	0.00	0.00	
Total	127.03	46.78	14.29	0.03	5.26	0.29	4.42	0.10	0.09	Hexane

**Appendix A: Emissions Calculations
Grain Conveyor**

Company Name: Consolidated Grain & Barge Company
Address City IN Zip: 210 George Street, Aurora, Indiana 47001
Permit Number: M029-20284-00024
Revision Number: 029-27966-00024
Reviewer: Anne-Marie C. Hart
Date: June 9, 2009

Uncontrolled Emissions

Emission Unit	Maximum Throughput (tons/hour)	PM Emission Factor (lb/ton)	PM10 Emission Factor (lb/ton)	Potential PM Emissions (tons/year)	Potential PM10 Emissions (tons/year)
Hopper w/Belt Feeder (SCC-1)	300	0.0001	0.0001	0.1314	0.1314
Conveyor #1	300	0.003	0.0011	3.942	1.4454
Conveyor #2	300	0.003	0.0011	3.942	1.4454
Conveyor #3	300	0.003	0.0011	3.942	1.4454
Conveyor #4	300	0.003	0.0011	3.942	1.4454
Barge Conveyor #5	300	0.003	0.0011	3.942	1.4454
Total				19.8414	7.3584

The grain conveyors will replace the unpaved road traffic pursuant to this Notice-Only Change 029-27966-00024

There are no emission factors for PM2.5. PM10 will be used as a surrogate for PM2.5.

Emission factors from AP-42, Chapter 11.19.2, Table 11.19.2-2 Crushed Stone Processing Operations (AP-42, 08/04)

Methodology

Potential PM Emissions (tons/year) = Maximum Throughput (tons/hour) x PM Emission Factor (lb/ton) x 8760 (hr/year) x 1 ton/2000 lb

Potential PM10 Emissions (tons/year) = Maximum Throughput (tons/hour) x PM10 Emission Factor (lb/ton) x 8760 (hr/year) x 1 ton/2000 lb

Appendix A: Emissions Calculations
Petroleum Coke and Oversize Product Handling and Storage

Company Name: Consolidated Grain & Barge Company
Address City IN Zip: 210 George Street, Aurora, Indiana 47001
Permit Number: M029-20284-00024
Revision Number: 029-27966-00024
Reviewer: Anne-Marie C. Hart
Date: June 9, 2009

Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$E_f = k \cdot (0.0032)^k \cdot (U/5)^{1.3} / (M/2)^{1.4}$$

where: E_f = Emission factor (lb/ton)

k (PM) = 0.74 = particle size multiplier (0.74 assumed for aerodynamic diameter ≤ 100 μ m)
 k (PM10) = 0.35 = particle size multiplier (0.35 assumed for aerodynamic diameter ≤ 10 μ m)
 k (PM2.5) = 0.053
 U = 9.6 = worst case annual mean wind speed (Source: NOAA, 2005*)
 M = 4.5 = material % moisture content of materials (Based upon coal as received)

E_f (PM) = 1.78E-03 lb PM/ton of material handled
 E_f (PM10) = 8.40E-04 lb PM10/ton of material handled
 E_f (PM2.5) = 1.27E-04 lb PM2.5/ton of material handled

Maximum Material Handling Throughput = 300 tons/hr
 Maximum Material Handling Throughput = 2,628,000 tons/yr

Type of Activity	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)	PTE of PM2.5 (tons/year)
Truck unloading of materials into storage piles	2.33	1.10	0.17
Front-end loader dumping of materials into conveyor	2.33	1.10	0.17
Conveyor dropping material to Barges	2.33	1.10	0.17
Total (tons/yr)	7.00	3.31	0.50

Methodology

Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

*Worst case annual mean wind speed (South Bend, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2005

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 μ m)
 PTE = Potential to Emit

Appendix A: Emission Calculations
Grain Elevator Operation

Company Name: Consolidated Grain & Barge Company
Address City IN Zip: 210 George Street, Aurora, Indiana 47001
Permit Number: M029-20284-00024
Revision Number: 029-27966-00024
Reviewer: Anne-Marie C. Hart
Date: June 9, 2009

Process	Throughput (tons/year)	Emission Factor (lb/ton)			Potential Emissions (ton/year)			Control Efficiency	Controlled Emissions (tons/year)		
		PM	PM10	PM2.5	PM	PM10	PM2.5		PM	PM10	PM2.5
Grain Receiving*											
Corn	504,000										
100% Hopper	504,000	0.035	0.0078	0.0013	8.820	1.966	0.328	99% Enclosure & Baghouse	0.09	0.02	0.003
100% Straight	504,000	0.18	0.059	0.01	45.360	14.868	2.520		0.45	0.15	0.03
Soybeans	195,476										
100% Hopper	195,476	0.035	0.0078	0.0013	3.421	0.762	0.127		0.03	0.01	0.001
100% Straight	195,476	0.18	0.059	0.01	17.593	5.767	0.977		0.18	0.06	0.01
Wheat	12,855										
100% Hopper	12,855	0.035	0.0078	0.0013	0.225	0.050	0.008		0.002	0.001	0.0001
100% Straight	12,855	0.18	0.059	0.01	1.157	0.379	0.064		0.012	0.004	0.001
Column Grain Drying									0%		
Corn	5,231	0.22	0.055	0.0094	0.575	0.144	0.025		0.58	0.14	0.02
Headhouse and Grain Handling											
Corn	504,000	0.061	0.034	0.0058	15.372	8.568	1.462	90% Enclosure	1.54	0.86	0.15
Soybeans	195,476	0.061	0.034	0.0058	5.962	3.323	0.567		0.60	0.33	0.06
Wheat	12,855	0.061	0.034	0.0058	0.392	0.219	0.037		0.04	0.02	0.00
Bin Loading											
Corn	199,800	0.025	0.0063	0.0011	2.498	0.629	0.110	90% Enclosure	0.25	0.06	0.01
Soybeans	117,000	0.025	0.0063	0.0011	1.463	0.369	0.064		0.15	0.04	0.01
Wheat	7,712	0.025	0.0063	0.0011	0.096	0.024	0.004		0.01	0.00	0.00
Grain Shipping*											
Corn	504,000							90% Enclosure			
100% Barge	504,000	0.016	0.004	0.00055	4.032	1.008	0.139		0.40	0.10	0.01
100% Rail	504,000	0.027	0.0022	0.00037	6.804	0.554	0.093		0.68	0.06	0.01
Soybeans	195,476										
100% Barge	195,476	0.016	0.004	0.00055	1.564	0.391	0.054		0.16	0.04	0.01
100% Rail	195,476	0.027	0.0022	0.00037	2.639	0.215	0.036		0.26	0.02	0.00
Wheat	12,855										
100% Barge	12,855	0.016	0.004	0.00055	0.103	0.026	0.004		0.01	0.003	0.0004
100% Wheat	12,855	0.027	0.0022	0.00037	0.174	0.014	0.002		0.02	0.001	0.0002
Total Worst Case*					100.08	35.71	6.03			4.76	1.81

* More than one method of shipping and receiving is utilized at the source. The worst-case shipping and receiving scenario has been assumed
Emission factors from AP-42 Ch. 9.9.1, Grain Elevators and Processes, Table 9.9.1-1 (3/03)
Methodology
Potential Emissions (tons/year) = Throughput (tons/year) x Emission Factor (lb/ton) x 1 ton/2000 pounds
Controlled Emissions (tons/year) = Potential Emissions (tons/year) x (1-Control Efficiency)

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

Company Name: Consolidated Grain & Barge Company
Address City IN Zip: 210 George Street, Aurora, Indiana 47001
Permit Number: M029-20284-00024
Revision Number: 029-27966-00024
Reviewer: Anne-Marie C. Hart
Date: June 9, 2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

12.0

105.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10/PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.10	0.40	0.03	5.26	0.29	4.42

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.104E-04	6.307E-05	3.942E-03	9.461E-02	1.787E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.628E-05	5.782E-05	7.358E-05	1.997E-05	1.104E-04

Total HAPs 9.919E-02

Methodology is the same as above.

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

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



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

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

TO: Scott Perkins
Facility Manager
Consolidated Grain & Barge Company
210 George St.
Aurora IN 47001

DATE: June 12, 2009

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

SUBJECT: Final Decision
MSOP Notice Only Change
029-27966-00024

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:
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.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	BLOCCHET 6/12/2009 Consolidated Grain & Barge Company 029-27966-00024 (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: CERTIFICATE OF MAILING ONLY	

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		Scott Perkins Facility Manager Consolidated Grain & Barge Company 210 George St Aurora IN 47001 (Source CAATS) Via Confirmed Delivery									
2		Michael & Monica Ramsey 9931 Old SR 56 Aurora IN 47001 (Affected Party)									
3		Dearborn County Commissioner 215 B West High Street Lawrenceburg IN 47025 (Local Official)									
4		Dearborn County Health Department 215-b W. Hight St, County Admin Building Lawrenceburg IN 47025-1910 (Health Department)									
5		Mr. John Teaney P.O. Box 494 10837 Aurora IN 47001 (Affected Party)									
6		Robin & Vic Willoughby PO BOX 238 Aurora IN 47001 (Affected Party)									
7		Aurora City Council and Mayors Office P.O. Box 158 Aurora IN 47001 (Local Official)									
8		James & Mary Hassett 7199 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)									
9		Nancy & William McDaniel 4600 Hartford PK # 98 Aurora IN 47001 (Affected Party)									
10		Ken & Jackie Greive 4685 E. Laughery Creek Road Aurora IN 47001 (Affected Party)									
11		Marlin M. Guss, Jr. 10400 Millstone Dr, P.O. Box 272 Aurora IN 47001 (Affected Party)									
12		Mrs. Shirley Greive 4412 E. Laughery Aurora IN 47001 (Affected Party)									
13		Ms. Patricia Huff 10095 Old SR 56 Aurora IN 47001 (Affected Party)									
14		Sam & Nancy Valone 3826 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)									
15		Peter & Jody Franklin 9212 Hawksridge Dr. Covington KY 41017-9136 (Affected Party)									

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Mail Code 61-53

IDEM Staff	BLOCCHET 6/12/2009 Consolidated Grain & Barge Company 27966 (draft/final)		Type of Mail: CERTIFICATE OF MAILING ONLY	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		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling 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		Melanie 4172 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)									
2		Mr. Bill Ullrich Dearborn County Council VP 103 Deborah Dr. Aurora IN 47001 (Affected Party)									
3											
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