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: January 27, 2010

RE: Consolidated Grain & Barge / 029 - 28523 - 00024

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

IDEM

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Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Consolidated Grain and 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 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.: M029-28523-00024	
Issued by: Alfred C. Dumaual, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: January 27, 2010 Expiration Date: January 27, 2020

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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 St, Aurora, IN 47001
General Source Phone Number:	(812) 926-0740
SIC Code:	5153
County Location:	Dearborn County (Central Township)
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) 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;

(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; and

(y) One (1) bulk conveyor system, 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) bulk 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

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

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

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

(a) This permit, M029-28523-00024, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

(c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) All terms and conditions of permits established prior to M029-28523-00024 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

(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

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

B.16 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
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]

(a) The Permittee shall pay annual fees due within thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Permit Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.6 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 2-1.1-1(1).

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

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

C.7 Performance Testing [326 IAC 3-6]

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 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.10 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.11 Instrument Specifications [326 IAC 2-1.1-11]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.14 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.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.

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

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

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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) natural gas fired column grain dryer, 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;

(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, constructed in 2007, with a maximum capacity of 300 tons of materials per hour; and

(y) One (1) bulk conveyor system, 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) bulk 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 emissions unit 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:

The permittee shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

(A) Housekeeping practices shall be conducted as follows:

(i) Areas to be swept and maintained shall include, at a minimum, the following:

(AA) General grounds, yard, and other open areas.
(BB) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
(CC) Grain driers with respect to accumulated particulate matter.

(ii) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.

(iii) Dust from driveways, access roads, and other areas of travel shall be controlled.

(iv) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(B) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:

(i) Malfunctions.
(ii) Breakdowns.
(iii) Improper adjustment.
(iv) Operating above the rated or designed capacity.
(v) Not following designed operating specifications.
(vi) Lack of good preventive maintenance care.
(vii) Lack of critical and proper spare replacement parts on hand.
(viii) Lack of properly trained and experienced personnel.

(C) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 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 bulk conveyor system shall each not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

Facility	Process Weight Rate (tons/hr)	Stack Flow Rate (acfm)	Allowable Particulate Emission (lb/hr)* (6.5-1-2)	Potential Emissions (lb/hr)**	Controlled Emissions (lb/hr)	Able to Comply?
natural gas fired column grain dryer***	60			13.20	13.20	N/A
Dump Pits #1 & #2	1200	114700	29.49	216.00	2.16	yes
Dump Pit #3	600	20000	5.14	108.00	1.08	yes

No other facilities at the source have a stack flow rate used to calculate the 326 IAC 6.5-1-2 Allowable Particulate Emissions.

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

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

*** Pursuant to 326 IAC 6.5-1-1(b) Particulate limitations shall not be established for combustion units that burn only natural gas at sources or facilities identified in 326 IAC 6.5-2 through 326 IAC 6.5-10, as long as the units continue to burn only natural gas.

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

(a) 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.

(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.

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

D.1.5 Visible Emissions Notations

(a) Visible emission notations of baghouse exhaust, used in conjunction with grain dump pits #1, #2 and #3, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring

(a) 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 day when the processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.7 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

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

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

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

D.1.8 Record Keeping Requirements

(a) To document compliance with Condition D.1.5, the Permittee shall maintain records once per day of visible emission notations of the baghouse exhausts, used in conjunction with the three (3) grain dump pits #1, #2 and #3. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

(b) To document compliance with Condition D.1.6, the Permittee shall maintain records once per day of the pressure drop across the baghouse, used in conjunction with the three (3) grain dump pits #1, #2 and #3. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

(c) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(d) 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

MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION

Source Name: Consolidated Grain and Barge Company
Source Address: 210 George Street, Aurora, Indiana 47001
Mailing Address: 210 George St, Aurora, IN 47001
MSOP No.: M029-28523-00024

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:
Printed Name:
Title/Position:
Date:

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	Consolidated Grain and Barge Company
Address:	210 George Street
City:	Aurora, Indiana 47001
Phone #:	(812) 926-0740
MSOP #:	M029-28523-00024

I hereby certify that Consolidated Grain and Barge Compa is :

☐ still in operation.

☐ no longer in operation.

I hereby certify that Consolidated Grain and Barge Compa is :

☐ in compliance with the requirements of MSOP M029-28523-00024.

☐ not in compliance with the requirements of MSOP M029-28523-00024.

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 ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

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

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**Consolidated Grain & Barge Company**
Source Location:	**210 George Street, Aurora, Indiana 47001**
County:	**Central Township of Dearborn County**
SIC Code:	**5153**
Permit Renewal No.:	**M029-28523-00024**
Permit Reviewer:	**Jeff Scull**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Consolidated Grain & Barge Company relating to the operation of a stationary whole grain handling operation.

History

On October 1, 2009, Consolidated Grain & Barge Company submitted an application to the OAQ requesting to renew its operating permit. Consolidated Grain & Barge Company was issued an MSOP, permit number M029-20284-00024, on February 28, 2005.

Permitted Emission Units and Pollution Control Equipment

(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 combined 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;

(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; and

(y) One (1) bulk conveyor system, 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) bulk 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.

Existing Approvals

Since the issuance of the MSOP M029-20284-00024 on February 28, 2005, the source has constructed or has been operating under the following approvals as well:

(a) Minor Permit Revision No. 029-25121-00024 issued on September 19, 2007;

(b) First Notice-Only Change No. 029-26217-00024 issued on March 18, 2008; and

(c) Second Notice-Only Change No. 029-27966-00024 issued on June 12, 2009.

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

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

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

Pursuant to 326 IAC 6-3-1(c)(3), each of the facilities at the source are exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), since they are subject to more stringent PM limits under the requirements of 326 IAC 6.5. Therefore, the particulate matter limitation requirements have been updated.

(b) Compliance Monitoring Requirements

Visible Emissions Notations and Parametric Monitoring have been updated from once per shift to once per day. The Baghouse Inspections are no longer required and have been removed from the permit. The Record Keeping and Reporting Requirements have been updated to reflect these changes as well.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this MSOP Renewal:

(a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^oF)
S-1	Pits #1 and #2	14	1.8 x 0.839(Rect)	114,700	Ambient
S-2	Pit #3	11	2.5	20,000	Ambient
S-3	Grain Dryer	45	2.17	25,000	160

County Attainment Status

The source is located in Central Township of Dearborn County

Pollutant	Designation
SO_2	Cannot be classified.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Nonattainment Subpart 1 effective June 15, 2004, for the 8-hour ozone standard for the Cincinnati-Hamilton OH-KY-IN area, including Lawrenceburg Township of Dearborn County. The remainder of Dearborn County is unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Basic nonattainment designation effective federally April 5, 2005, for the Lawrenceburg Twp for PM2.5. The remainder of Dearborn County is unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards

(1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.

(3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.

(4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. The portion of Dearborn County in which this source is located (Central Township) 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.

The portion of Dearborn County in which this source is located (Central Township) 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.

(b) Other Criteria Pollutants
The portion of Dearborn County in which this source is located (Central Township) 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.

(c) Fugitive Emissions
Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

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

Potential to Emit After Issuance

(a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

New Source Performance Standards (NSPS)

(a) The requirements of the NSPS (40 CFR Part 60, Subpart DD) for Grain Elevators (326 IAC 12) are not included in this permit because the source has a permanent storage capacity less than 2.5 million U.S. bushels. The maximum storage capacity of the source is approximately 1.23 million U.S. bushels.

(b) 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)

(c) 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 permit.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3 and submitted a Preventive Maintenance Plan (PMP) on August 7, 2006, and ammended the PMP on January 26, 2007.

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)
Although the source was constructed after the August 7, 1977 PSD rule applicability date, it is not considered a major source because it does not have the potential to emit 250 tons per year or more of any criteria pollutant and it is not one of the 28 listed source categories. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2 2 do not apply.

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

326 IAC 5-1 (Opacity Limitations)
This source is not subject to the requirements of 326 IAC 5-1 (Opacity Limitations) because opacity limitations have been established for this source pursuant to 326 IAC 6.5-1-2.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The particulate emission limits for the source have been established as pursuant to 326 IAC 6.5-1-2(a), therefore 326 IAC 6-3 is not applicable to the source.

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because the source is not located in a nonattainment area for particulate matter and does not have fugitive emissions exceeding twenty-five (25) tons per year.

326 IAC 6.5-1(Particulate Matter Limitations except Lake County)
This source is located in Dearborn County and is not specifically listed in Sections 326 IAC 6.5-2 through 326 IAC 6.5-10. The source has the potential to emit one hundred (100) tons or more, or actual emissions of ten (10) tons or more, of particulate matter (PM) per year. Therefore, this source is subject to 326 IAC 6.5-1-2.

Allowable limits are listed below for the affected facilities.

Facility	Process Weight Rate (tons/hr)	Stack Flow Rate (acfm)	Allowable Particulate Emission (lb/hr)* (6.5-1-2)	Potential Emissions (lb/hr)**	Controlled Emissions (lb/hr)	Able to Comply?
natural gas fired column grain dryer***	60			13.20	13.20	N/A
Dump Pits #1 & #2	1200	114700	29.49	216.00	2.16	yes
Dump Pit #3	600	20000	5.14	108.00	1.08	yes

No other facilities at the source have a stack flow rate used to calculate the 326 IAC 6.5-1-2 Allowable Particulate Emissions.

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

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

*** Pursuant to 326 IAC 6.5-1-1(b) Particulate limitations shall not be established for combustion units that burn only natural gas at sources or facilities identified in 326 IAC 6.5-2 through 326 IAC 6.5-10, as long as the units continue to burn only natural gas.

326 IAC 6.5-2 through 326 IAC 6.5-10 (Particulate Matter Limitations Except Lake County)
This source, located in Dearborn County, is not subject to the requirements of 326 IAC 6.5-2 through 326 IAC 6.5-10, since it is not one of the Dearborn County sources listed in 326 IAC 6.5-3.

State Rule Applicability – Individual Facilities

326 IAC 6-2 (Particulate Emissions for Sources of Indirect Heating)
The one (1) natural gas fired column grain dryer is not a source of indirect heating, because the combustion gasses pass through the dryer directly contacting the material being dried. Therefore, this unit is not subject to 326 IAC 6-2.

326 IAC 6.5-1(Particulate Matter Limitations)

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

(b) Pursuant to 326 IAC 6.5-1-2(d)(1) grain elevators that began construction or modification before January 13, 1977 are subject to the requirements of 326 IAC 6.5-1-2(d)(1). This source began construction or modification after January 13, 1977. Therefore, the requirements of 326 IAC 6.5-1-2(d)(1) for grain elevators are not applicable.

(c) Pursuant to 326 IAC 6.5-1-2(d)(2) and M029-20284-00024, issued on February 28, 2005, all grain elevators shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

(A) Housekeeping practices shall be conducted as follows:

(i) Areas to be swept and maintained shall include, at a minimum, the following:

(AA) General grounds, yard, and other open areas.
(BB) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
(CC) Grain driers with respect to accumulated particulate matter.

(ii) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.

(iii) Dust from driveways, access roads, and other areas of travel shall be controlled.

(iv) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(B) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:

(i) Malfunctions.
(ii) Breakdowns.
(iii) Improper adjustment.
(iv) Operating above the rated or designed capacity.
(v) Not following designed operating specifications.
(vi) Lack of good preventive maintenance care.
(vii) Lack of critical and proper spare replacement parts on hand.
(viii) Lack of properly trained and experienced personnel.

(C) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

Compliance Determination and Monitoring Requirements

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

Control	**Parameter**	**Frequency**	**Range**	**Excursions and Exceedances**
baghouse for particulate matter control for two (2) dump pits (Pits #1 and #2) , exhausting through stack S-1	Water Pressure Drop	Daily	0.5 and 5.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
baghouse for particulate matter control for one (1) dump pit (Pit #3), exhausting through stack S-2	Water Pressure Drop	Daily	0.5 and 5.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

Recommendation

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

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

An application for the purposes of this review was received on October 1, 2009.

Conclusion

The operation of this stationary whole grain handling operation shall be subject to the conditions of the attached MSOP Renewal No. M029-28523-00024.

Appendix A: Emission Calculations
Emissions Summary

Company Name: Consolidated Grain & Barge Company
Address City IN Zip: 210 George Street, Aurora, Indiana 47001
Permit Number: M029-28523-00024
Plt ID: 029-00024
Reviewer: Jeff Scull
Date: October 23, 2009

Uncontrolled Potential Emissions

	Emissions Generating Activity					
Pollutant	Grain Handling and Drying	Natural Gas Combustion	Bulk Conveyors	Petroleum Coke and Ovesize Product Handling	Paved Roads	**TOTAL**
PM	100.50	0.10	19.84	6.44	7.51	134.40
PM-10	35.86	0.40	7.36	3.05	1.46	48.12
PM-2.5	6.05	0.40	7.36	0.46	1.46	15.73
SO2	0.00	0.03	0.00	0.00	0.00	0.03
NOx	0.00	5.26	0.00	0.00	0.00	5.26
VOC	0.00	0.29	0.00	0.00	0.00	0.29
CO	0.00	4.42	0.00	0.00	0.00	4.42
HAPs	0.00	0.10	0.00	0.00	0.00	0.10

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions

	Emissions Generating Activity					
Pollutant	Grain Handling and Drying	Natural Gas Combustion	Bulk Conveyors	Petroleum Coke and Ovesize Product Handling	Paved Roads*	**TOTAL**
PM	4.85	0.10	19.84	6.44	6.88	38.10
PM-10	1.83	0.40	7.36	3.05	1.34	13.98
PM-2.5	0.31	0.40	7.36	0.46	1.34	9.87
SO2	0.00	0.03	0.00	0.00	0.00	0.03
NOx	0.00	5.26	0.00	0.00	0.00	5.26
VOC	0.00	0.29	0.00	0.00	0.00	0.29
CO	0.00	4.42	0.00	0.00	0.00	4.42
HAPs	0.00	0.10	0.00	0.00	0.00	0.10

Total emissions based on rated capacity at 8,760 hours/year.

*Mitigated PTE (tons/yr) is taking natural mitigation due to precipitation into consideration.

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: M029-28523-00024
Plt ID: 029-00024
Reviewer: Jeff Scull
Date: October 23, 2009

Process	Throughput	Emission Factor (lb/ton)			Potential Emissions (ton/year)			Control Efficiency	Controlled Emissions (tons/year)		
Grain Receiving*	(tons/year)	PM	PM10	PM2.5	PM	PM10	PM2.5		PM	PM10	PM2.5
Corn	510,547										
100% Hopper	510,547	0.035	0.0078	0.0013	8.935	1.991	0.332		0.09	0.02	0.003
100% Straight	510,547	0.18	0.059	0.01	45.949	15.061	2.553		0.46	0.15	0.03
Soybeans	190,920										
100% Hopper	190,920	0.035	0.0078	0.0013	3.341	0.745	0.124		0.03	0.01	0.001
100% Straight	190,920	0.18	0.059	0.01	17.183	5.632	0.955	99%	0.17	0.06	0.01
Wheat	13,393										
100% Hopper	13,393	0.035	0.0078	0.0013	0.234	0.052	0.009	Enclosure & Baghouse	0.002	0.001	0.0001
100% Straight	13,393	0.18	0.059	0.01	1.205	0.395	0.067		0.012	0.004	0.001
Column Grain Drying								0%			
Corn	5,943	0.22	0.055	0.0094	0.654	0.163	0.028		0.65	0.16	0.03
Headhouse and Grain Handling											
Corn	510,547	0.061	0.034	0.0058	15.572	8.679	1.481	90%	1.56	0.87	0.15
Soybeans	190,920	0.061	0.034	0.0058	5.823	3.246	0.554	Enclosure	0.58	0.32	0.06
Wheat	13,393	0.061	0.034	0.0058	0.408	0.228	0.039		0.04	0.02	0.00
Bin Loading											
Corn	199,800	0.025	0.0063	0.0011	2.498	0.629	0.110	90%	0.25	0.06	0.01
Soybeans	117,000	0.025	0.0063	0.0011	1.463	0.369	0.064	Enclosure	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	510,547										
100% Barge	510,547	0.016	0.004	0.0006	4.084	1.021	0.140		0.41	0.10	0.01
100% Rail	510,547	0.027	0.0022	0.0004	6.892	0.562	0.094		0.69	0.06	0.01
Soybeans	190,920										
100% Barge	190,920	0.016	0.004	0.0006	1.527	0.382	0.053	90%	0.15	0.04	0.01
100% Rail	190,920	0.027	0.0022	0.0004	2.577	0.210	0.035		0.26	0.02	0.00
Wheat	13,393							Enclosure			
100% Barge	13,393	0.016	0.004	0.0006	0.107	0.027	0.004		0.01	0.003	0.0004
100% Wheat	13,393	0.027	0.0022	0.0004	0.181	0.015	0.002		0.02	0.001	0.0002
Total Worst Case*					**100.50**	**35.86**	**6.05**		**4.85**	**1.83**	**0.31**

* More than one method of shipping and receiving is utilized at the source. The worst-case shipping and receiving scenario has been assumed. For Receiving the source uses Hopper Trucks and Straight Trucks, the emission factor for Straight Trucks is about five times higher than the emission factor for Hopper Trucks; therefore it is assumed that all grain is received by Straight Trucks. The source ships by barge and by rail, the emission factor for shipping and rail are different for each pollutant; Therefore it is assumed that the source uses the shipping method with the worst case emission factor for each pollutant to ship all the grain.
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)
Control Efficiency is 99% for grain receiving with the use of enclosure and a baghouse, is 90% for Head House, Grain Handling, Bin Loading, and Grain Shipping equipped with enclosure only, and is 0% for the Column Grain Drying with no control devices.
Throughput is total maximum amount of grain received equals the 5 year maximum received multiplied by a factor of 1.2. This is based on the EPA memorandum dated November 14, 1995 on calculating the potential to emit and other guidance for grain handling facilities. The source provided this data on November 23,
Throughput: Corn 425,456 tpy x 1.2 = 510,547 tpy; Soybean 159,100 x 1.2 = 190,920 tpy; Wheat 11,161 tpy x 1.2 = 13,393 tpy; Corn Drying 4953 tpy x 1.2 = 5943 tpy.

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: M029-28523-00024
Plt ID: 029-00024
Reviewer: Jeff Scull
Date: October 23, 2009

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
12.0	105.1

	Pollutant					
	PM*	PM10/PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100 **see below	5.5	84
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

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	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

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	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.

Appendix A: Emissions Calculations
Bulk Conveyor

Company Name: Consolidated Grain & Barge Company
Address City IN Zip: 210 George Street, Aurora, Indiana 47001
Permit Number: M029-28523-00024
Plt ID: 029-00024
Reviewer: Jeff Scull
Date: October 23, 2009

Uncontrolled Emissions

Emission Unit	Maximum Throughput (tons/hour)	PM Emission Factor (lb/ton)	PM10/PM2.5 Emission Factor	Potential PM Emissions (tons/year)	Potential PM10/PM2.5 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 bulk conveyors replaced the unpaved road traffic pursuant to 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, Chpater 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 Ovesize Product Handling and Storage

Company Name: Consolidated Grain & Barge Company
Address City IN Zip: 210 George Street, Aurora, Indiana 47001
Permit Number: M029-28523-00024
Plt ID: 029-00024
Reviewer: Jeff Scull
Date: October 23, 2009

Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and hangling 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.

Ef = k*(0.0032)*[(U/5)^1.3 / (M/2)^1.4]

where: Ef = Emission factor (lb/ton)

k (PM) =	0.74	= particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
k (PM10) =	0.35	= particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
k(PM2.5) =	0.053	
U =	9	= worst case annual mean wind speed (Source: NOAA, 2008*)
M =	4.5	= material % moisture content of materials (Based upon coal as received)
Ef (PM) =	1.63E-03	lb PM/ton of material handled
Ef (PM10) =	7.73E-04	lb PM10/ton of material handled
Ef (PM2.5) =	1.17E-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	2.15	1.02	0.15
Front-end loader dumping of materials into conveyor	2.15	1.02	0.15
Conveyor dropping material to Barges	2.15	1.02	0.15
Total (tons/yr)	**6.44**	**3.05**	**0.46**

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 (Greater Cincinnati Airport) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2008

Abbreviations

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

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Consolidated Grain & Barge Company
Address City IN Zip: 210 George Street, Aurora, Indiana 47001
Permit Number: M029-28523-00024
Plt ID: 029-00024
Reviewer: Jeff Scull
Date: October 23, 2009

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip	19.0	5.0	95.0	40.0	3800.0	1100	0.208	19.8	7224.0
Vehicle (leaving plant) (one-way trip)	19.0	5.0	95.0	15.0	1425.0	1100	0.208	19.8	7224.0
		Total	**190.0**		**5225.0**			**39.6**	**14447.9**

Average Vehicle Weight Per Trip = 27.5 tons/trip
Average Miles Per Trip = 0.21 miles/trip

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

	PM	PM10	
where k =	0.082	0.016	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	27.5	27.5	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	g/m^2 = Ubitiguous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)]
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 124 days of rain greater than or equal to 0.01 inches (Source: NOAA, 2008*)
N = 365 days per year

	PM	PM10	
Unmitigated Emission Factor, Ef =	1.04	0.20	lb/mile
Mitigated Emission Factor, Eext =	0.95	0.19	lb/mile
Dust Control Efficiency =	50%	50%	(pursuant to control measures outlined in 326 IAC 6.5-1-2(d)(2))

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM 2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM 2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM 2.5 (tons/yr)
Vehicle (entering plant) (one-way trip	3.76	0.73	0.73	3.44	0.67	0.67	1.72	0.33	0.33
Vehicle (leaving plant) (one-way trip)	3.76	0.73	0.73	3.44	0.67	0.67	1.72	0.33	0.33
	7.51	**1.46**	**1.46**	**6.88**	**1.34**	**1.34**	**3.44**	**0.67**	**0.67**

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

*Days of rain greater than or equal to 0.01 inches (Greater Cincinnati Airport) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2008

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PTE = Potential to Emit

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

Company Name: **Consolidated Grain & Barge Company**
Address City IN Zip: **210 George Street, Aurora, Indiana 47001**
Permit Number: **M029-28523-00024**
Plt ID: **029-00024**
Reviewer: **Jeff Scull**
Date: **November 10, 2009**

Facility	Process Weight Rate (tons/hr)	Stack Flow Rate (acfm)	Allowable Particulate Emission (lb/hr)* (6.5-1-2)	Potential Emissions (lb/hr)**	Controlled Emissions (lb/hr)	Able to Comply?
natural gas fired column grain dryer***	60			13.20	13.20	N/A
Dump Pits #1 & #2	1200	114700	29.49	216.00	2.16	yes
Dump Pit #3	600	20000	5.14	108.00	1.08	yes

No other facilities at the source have a stack flow rate used to calculate the 326 IAC 6.5-1-2 Allowable Particulate Emissions.

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

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

*** Pursuant to 326 IAC 6.5-1-1(b) Particulate limitations shall not be established for combustion units that burn only natural gas at sources or facilities identified in 326 IAC 6.5-2 through 326 IAC 6.5-10, as long as the units continue to burn only natural gas.

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
Consolidated Grain & Barge
210 George St
Aurora, IN 47001

DATE: January 27, 2010

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

SUBJECT: Final Decision
MSOP - Renewal
029 - 28523 - 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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

January 27, 2010

TO: Aurora Public Library

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

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

Applicant Name: Consolidated Grain & Barge
Permit Number: 029 - 28523 - 00024

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	LPOGOST 1/27/2010 Consolidated Grain & Barge Company 029 - 28523 - 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 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		Aurora Public Library 414 Second St Aurora IN 47001-1384 *(Library)*									
4		Dearborn County Commissioner 215 B West High Street Lawrenceburg IN 47025 *(Local Official)*									
5		Dearborn County Health Department 215-b W. Hight St, County Admin Building Lawrenceburg IN 47025-1910 *(Health Department)*									
6		Mr. John Teaney P.O. Box 494 10837 Aurora IN 47001 *(Affected Party)*									
7		Robin & Vic Willoughby 311 Broadway Street Aurora IN 47001 *(Affected Party)*									
8		Aurora City Council and Mayors Office P.O. Box 158 Aurora IN 47001 *(Local Official)*									
9		James & Mary Hassett 7199 E. Laughery Creek Rd Aurora IN 47001 *(Affected Party)*									
10		Nancy & William McDaniel 4600 Hartford PK # 98 Aurora IN 47001 *(Affected Party)*									
11		Ken & Jackie Greive 4685 E. Laughery Creek Road Aurora IN 47001 *(Affected Party)*									
12		Marlin M. Guss, Jr. 10400 Millstone Dr, P.O. Box 272 Aurora IN 47001 *(Affected Party)*									
13		Mrs. Shirley Greive 4412 E. Laughery Aurora IN 47001 (Affected Party)									
14		Ms. Patricia Huff 10095 Old SR 56 Aurora IN 47001 *(Affected Party)*									
15		Sam & Nancy Valone 3826 E. Laughery Creek Rd Aurora IN 47001 *(Affected Party)*									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

FACSIMILIE OF PS Form 3877

Mail Code 61-53

IDEM Staff	LPOGOST 1/27/2010 Consolidated Grain & Barge Company 28523 (draft/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		Peter & Jody 9212 Hawksridge Dr. Covington KY 41017-9136 (Affected Party)									
2		Mrs. Melanie Bushorn 4172 E. Laughery Creek Rd Aurora IN 47001 *(Affected Party)*									
3		Mr. Bill Ullrich Dearborn County Council VP 103 Deborah Dr. Aurora IN 47001 *(Affected Party)*									
4											
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