



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: March 30, 2010

RE: ADM Grain Company / 147-28763-00055

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**ADM Grain Company
609 N. State Road 66
Rockport, Indiana 47635**

(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.: M147-28763-00055	
Issued by:  Alfred C. Dumauai, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: March 30, 2010 Expiration Date: March 30, 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 country grain elevator.

Source Address:	609 N. State Road 66, Rockport, Indiana 47635
Mailing Address:	4666 Faires Parkway, Decatur, IL 62526
General Source Phone Number:	(217) 424-5200
SIC Code:	5153
County Location:	Spencer
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other 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) truck receiving operation, identified as EP-1, consisting of the following equipment:
- (1) One (1) receiving pit, identified as Dump #1, constructed in 2002, receiving a maximum capacity of 18,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (2) One (1) receiving pit, identified as River Dump #2, constructed in 2002, receiving a maximum capacity of 25,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (3) One (1) receiving pit, identified as River Dump #3, constructed in 2002, receiving a maximum capacity of 25,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (4) One (1) receiving pit, identified as Dump #2, constructed in 2005, receiving a maximum capacity of 18,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
- (b) One (1) completely enclosed internal handling operation, identified as EP-2, consisting of the following equipment:
- (1) One (1) drag conveyor, identified as Dump #1 Drag Conveyor, constructed in 2002, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.

- (2) One (1) receiving leg, identified as Receiving Leg #1, constructed in 2002, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (3) One (1) bin 10 reclaim conveyor, identified as Bin 10 Reclaim Conveyor, constructed in 2002, with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (4) One (1) bin 20 reclaim, identified as Bin 20 Reclaim, constructed in 2002, with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (5) One (1) bin 30 reclaim, identified as Bin 30 Reclaim, constructed in 2002, with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (6) Two (2) storage bin reclaim conveyors, identified as Bin 15 Reclaim and Bin 25 Reclaim, constructed in 2005, each with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (7) One (1) storage bin fill conveyor, identified as Bin 25 Fill Conveyor, constructed in 2005, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (8) One (1) receiving pit conveyor, identified as Dump #2 Conveyor, constructed in 2005, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (9) One (1) receiving leg, identified as Receiving Leg #2, constructed in 2005, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (10) One (1) enclosed grain distributor, identified as Grain Distributor, constructed in 2005, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (11) One (1) storage bin reclaim conveyor, identified as Bin 26 Reclaim Conveyor, constructed in 2009, with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (12) One (1) storage bin fill conveyor, identified as Bin 26 Fill Conveyor, constructed in 2009, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
- (c) One (1) storage area, identified as EP-5, consisting of the following equipment:
- (1) Two (2) storage bins, identified as Bin 10 and Bin 30, constructed in 2002, respectively, with a storage capacity of 111,000 bushels, and exhausting to the atmosphere.
 - (2) One (1) storage bin, identified as Bin 20, constructed in 2002, with a storage capacity of 24,000 bushels, and exhausting to the atmosphere.
 - (3) One (1) storage bin, identified as Bin 25, constructed in 2005, with a storage capacity of 450,000 bushels, and exhausting to the atmosphere.

- (4) One (1) hopper bin, identified as Bin 15, constructed in 2005, with a storage capacity of 30,900 bushels, and exhausting to the atmosphere.
- (5) One (1) storage bin, identified as Bin 26, constructed in 2009, with a storage capacity of 650,000 bushels, and exhausting to the atmosphere.
- (d) One (1) barge shipping area, equipped with a spout, identified as EP-3, consisting of the following equipment:
 - (1) One (1) shipping conveyor, identified as Shipping Conveyor, constructed in 2002, with a maximum capacity of 25,000 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) barge conveyor, identified as Barge Conveyor, constructed in 2002, with a maximum capacity of 25,000 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) barge loadout, identified as Barge Loadout, constructed in 2002, with a maximum capacity of 25,000 bushels per hour, and exhausting to the atmosphere.
- (e) One (1) truck shipping area, equipped with a sock/sleeve, identified as EP-4, consisting of the following equipment:
 - (1) One (1) bin 20 sidedraw truck loadout, identified as Bin 20 Sidedraw Truck Loadout, constructed in 2002, with a maximum capacity of 6,000 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) leg spout truck loadout, identified as Leg Spout Truck Loadout, constructed in 2002, with a maximum capacity of 18,000 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) bin 15 sidedraw truck loadout, identified as Bin 15 Sidedraw Truck Loadout, constructed in 2005, with a maximum capacity of 6,000 bushels per hour, and exhausting to the atmosphere.
 - (4) One (1) bin 25 sidedraw truck loadout, identified as Bin 25 Sidedraw Truck Loadout, constructed in 2005, with a maximum capacity of 6,000 bushels per hour, and exhausting to the atmosphere.
 - (5) One (1) bin 10 sidedraw truck loadout, identified as Bin 10 Sidedraw Truck Loadout, constructed in 2002, capacity: with a maximum capacity of 6,000 bushels per hour, and exhausting to the atmosphere.
- (f) One (1) 41.6 million British thermal units (MMBtu) per hour natural gas-fired grain dryer, identified as EP-7, constructed in 2006, with a maximum capacity of 4,000 bushels of grain per hour, and exhausting to the atmosphere.
- (g) One (1) dryer conveying area consisting of the following equipment:
 - (1) One (1) conveyor, identified as Wet Drag, constructed in 2006, with a maximum capacity of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) conveyor, identified as Bottom Dry Drag, constructed in 2006, with a maximum capacity of 6,500 bushels per hour, and exhausting to the atmosphere.

- (3) One (1) conveyor, identified as Top Dry Drag, constructed in 2006, with a maximum capacity of 6,500 bushels per hour, and exhausting to the atmosphere.
- (h) Fugitive emissions from unpaved roads and parking lots. [326 IAC 6-5]

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, M147-28763-00055, 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. 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 Reserved

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) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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.

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

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

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M147-28763-00055 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 an affirmation that the statements in the application are true and complete 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, pursuant to 326 IAC 2-6.1-4(b), 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
- (c) The Permittee shall notify the OAQ no later than 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 an affirmation that the statements in the application are true and complete 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 no later than 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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 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.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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.

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

C.12 Reserved

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

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

Corrective Actions and Response Steps

C.14 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.15 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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.

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

C.16 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.17 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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.18 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) Reserved
- (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) truck receiving operation, identified as EP-1, consisting of the following equipment:
 - (1) One (1) receiving pit, identified as Dump #1, constructed in 2002, receiving a maximum capacity of 18,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (2) One (1) receiving pit, identified as River Dump #2, constructed in 2002, receiving a maximum capacity of 25,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (3) One (1) receiving pit, identified as River Dump #3, constructed in 2002, receiving a maximum capacity of 25,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (4) One (1) receiving pit, identified as Dump #2, constructed in 2005, receiving a maximum capacity of 18,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
- (b) One (1) completely enclosed internal handling operation, identified as EP-2, consisting of the following equipment:
 - (1) One (1) drag conveyor, identified as Dump #1 Drag Conveyor, constructed in 2002, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (2) One (1) receiving leg, identified as Receiving Leg #1, constructed in 2002, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (3) One (1) bin 10 reclaim conveyor, identified as Bin 10 Reclaim Conveyor, constructed in 2002, with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (4) One (1) bin 20 reclaim, identified as Bin 20 Reclaim, constructed in 2002, with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (5) One (1) bin 30 reclaim, identified as Bin 30 Reclaim, constructed in 2002, with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (6) Two (2) storage bin reclaim conveyors, identified as Bin 15 Reclaim and Bin 25 Reclaim, constructed in 2005, each with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (7) One (1) storage bin fill conveyor, identified as Bin 25 Fill Conveyor, constructed in 2005, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.

- (8) One (1) receiving pit conveyor, identified as Dump #2 Conveyor, constructed in 2005, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (9) One (1) receiving leg, identified as Receiving Leg #2, constructed in 2005, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (10) One (1) enclosed grain distributor, identified as Grain Distributor, constructed in 2005, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (11) One (1) storage bin reclaim conveyor, identified as Bin 26 Reclaim Conveyor, constructed in 2009, with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (12) One (1) storage bin fill conveyor, identified as Bin 26 Fill Conveyor, constructed in 2009, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
- (c) One (1) storage area, identified as EP-5, consisting of the following equipment:
- (1) Two (2) storage bins, identified as Bin 10 and Bin 30, constructed in 2002, respectively, with a storage capacity of 111,000 bushels, and exhausting to the atmosphere.
 - (2) One (1) storage bin, identified as Bin 20, constructed in 2002, with a storage capacity of 24,000 bushels, and exhausting to the atmosphere.
 - (3) One (1) storage bin, identified as Bin 25, constructed in 2005, with a storage capacity of 450,000 bushels, and exhausting to the atmosphere.
 - (4) One (1) hopper bin, identified as Bin 15, constructed in 2005, with a storage capacity of 30,900 bushels, and exhausting to the atmosphere.
 - (5) One (1) storage bin, identified as Bin 26, constructed in 2009, with a storage capacity of 650,000 bushels, and exhausting to the atmosphere.
- (d) One (1) barge shipping area, equipped with a spout, identified as EP-3, consisting of the following equipment:
- (1) One (1) shipping conveyor, identified as Shipping Conveyor, constructed in 2002, with a maximum capacity of 25,000 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) barge conveyor, identified as Barge Conveyor, constructed in 2002, with a maximum capacity of 25,000 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) barge loadout, identified as Barge Loadout, constructed in 2002, with a maximum capacity of 25,000 bushels per hour, and exhausting to the atmosphere.
- (e) One (1) truck shipping area, equipped with a sock/sleeve, identified as EP-4, consisting of the following equipment:

- (1) One (1) bin 20 sidedraw truck loadout, identified as Bin 20 Sidedraw Truck Loadout, constructed in 2002, with a maximum capacity of 6,000 bushels per hour, and exhausting to the atmosphere.
- (2) One (1) leg spout truck loadout, identified as Leg Spout Truck Loadout, constructed in 2002, with a maximum capacity of 18,000 bushels per hour, and exhausting to the atmosphere.
- (3) One (1) bin 15 sidedraw truck loadout, identified as Bin 15 Sidedraw Truck Loadout, constructed in 2005, with a maximum capacity of 6,000 bushels per hour, and exhausting to the atmosphere.
- (4) One (1) bin 25 sidedraw truck loadout, identified as Bin 25 Sidedraw Truck Loadout, constructed in 2005, with a maximum capacity of 6,000 bushels per hour, and exhausting to the atmosphere.
- (5) One (1) bin 10 sidedraw truck loadout, identified as Bin 10 Sidedraw Truck Loadout, constructed in 2002, capacity: with a maximum capacity of 6,000 bushels per hour, and exhausting to the atmosphere.
- (f) One (1) 41.6 million British thermal units (MMBtu) per hour natural gas-fired grain dryer, identified as EP-7, constructed in 2006, with a maximum capacity of 4,000 bushels of grain per hour, and exhausting to the atmosphere.
- (g) One (1) dryer conveying area consisting of the following equipment:
 - (1) One (1) conveyor, identified as Wet Drag, constructed in 2006, with a maximum capacity of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) conveyor, identified as Bottom Dry Drag, constructed in 2006, with a maximum capacity of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) conveyor, identified as Top Dry Drag, constructed in 2006, with a maximum capacity of 6,500 bushels per hour, and exhausting to the atmosphere.
- (h) Fugitive emissions from unpaved roads and parking lots. [326 IAC 6-5]

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

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

D.1.1 Particulate Matter Emission Limitation [326 IAC 2-2]

Pursuant to 326 IAC 2-2, the source, identified as ADM Grain Company, shall meet the following emission limits:

- (a) The existing stationary grain elevator shall be limited to a throughput of less than 30,000,000 bushels (900,000 tons) of grain per 12 consecutive month period.
- (b) Particulate Matter (PM) emissions for each of the existing stationary grain elevator shall be limited as follows:

Emission Units	Limited Grain Throughput (tons/yr)	PM Emission Limit (lbs PM / ton)	Limited PM Emissions (tons/yr)
Drying	900,000	0.220	82.50
Receiving	900,000	0.15	67.50
Shipping	900,000	0.086	38.70
Handling	900,000	0.061	27.45
Storage	900,000	0.025	11.25

D.1.2 Particulate [326 IAC 6-3-2]

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

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

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

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

Emissions Units	Maximum Process Weight (tons/hour) for each unit of that type	326 IAC 6-3 Allowable Emission Rate (lbs/hr) for each unit of that type	Maximum Particulate Emissions before control (lb/hour)
Dump #1	540	69.9	97.2
River Dump #2	750	73.9	135.0
River Dump #3	750	73.9	135.0
Dump #2	540	69.9	97.2
Dump #1 Drag Conveyor	540	69.9	32.9
Receiving Leg #1	540	69.9	32.9
Bin 10 Reclaim Conveyor	600	71.2	36.6
Bin 20 Reclaim	600	71.2	36.6
Bin 30 Reclaim	600	71.2	36.6
Bin 15 Reclaim	600	71.2	36.6
Bin 25 Reclaim	600	71.2	36.6
Bin 25 Fill Conveyor	540	69.9	32.9
Dump #2 Conveyor	540	69.9	32.9
Receiving Leg #2	540	69.9	32.9
Grain Distributor	540	69.9	32.9
Bin 26 Reclaim Conveyor	600	71.2	36.6
Bin 26 Fill Conveyor	540	69.9	32.9
Shipping Conveyor	750	73.9	12.0
Barge Conveyor	750	73.9	12.0
Barge Loadout	750	73.9	12.0
Bin 20 Sidedraw Truck	180	57.4	5.2
Leg Spout Truck Loadout	540	69.9	15.7
Bin 15 Sidedraw Truck	180	57.4	5.2
Bin 25 Sidedraw Truck	180	57.4	5.2
Bin 10 Sidedraw Truck	180	57.4	5.2
Grain Dryer	120	53.1	26.4

Emissions Units	Maximum Process Weight (tons/hour) for each unit of that type	326 IAC 6-3 Allowable Emission Rate (lbs/hr) for each unit of that type	Maximum Particulate Emissions before control (lb/hour)
Wet Drag	195	58.2	11.9
Bottom Dry Drag	195	58.2	11.9
Top Dry Drag	195	58.2	11.9

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

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Conditions D.1.1 and D.1.2, the baffles for particulate control shall be in operation and control PM emissions from each of the three (3) receiving pits, identified as Dump #1, River Dump #2, and River Dump #3, and the one (1) receiving pit, identified as Dump #2, at all times that the three (3) receiving pits, identified as Dump #1, River Dump #2, and River Dump #3, and the one (1) receiving pit, identified as Dump #2, are in operation.

Compliance Monitoring Requirements

D.1.5 Monitoring

To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. Section C - Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1(a) and (b), the Permittee shall maintain monthly records of the grain throughput for the entire source, and for the grain throughput dried.
- (b) To document the compliance status with Condition D.1.5, the Permittee shall maintain a log of weekly inspections of the baffle panels.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.7 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1(a) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	ADM Grain Company
Address:	609 N. State Road 66
City:	Rockport, Indiana 47635
Phone #:	(217) 424-5200
MSOP #:	M147-28763-00055

I hereby certify that ADM Grain Company is :

still in operation.

no longer in operation.

I hereby certify that ADM Grain Company is :

in compliance with the requirements of MSOP M147-28763-00055.

not in compliance with the requirements of MSOP M147-28763-00055.

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
COMPLIANCE AND ENFORCEMENT BRANCH**

MSOP Quarterly Report

Source Name: ADM Grain Company
Source Address: 609 N. State Road 66, Rockport, Indiana 47635
Mailing Address: 4666 Faires Parkway, Decatur, IL 62526
MSOP No.: M147-28763-00055
Facilities: Entire Source
Parameter: Grain Throughput
Limit: Less than 30,000,000 bushels (900,000 tons) per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attachment A

FUGITIVE DUST CONTROL PLAN

M147-28763-00055

ADM Grain Company
609 N. State Road 66
Rockport, IN 47635

Attachment A - Fugitive Dust Control Plan

The fugitive dust control plan components listed below will be implemented by Scott Sorrows, Regional Superintendent at the Rockport, IN facility at the address listed above. The components are outlined below:

The Rockport Grain Elevator receives grain by truck and is mostly shipped out by barge directly to ADM's customers. A small portion of our grain is shipped out by truck. Our complete list of processes and emission points are attached; along with a map showing our facility in detail.

Our fugitive emissions primarily come from our unpaved haul roads. We currently see approximately 72 trucks a day. The fugitive particulate matter (dust) that results from our unpaved haul roads is what needs to be addressed. These roads are used more frequently during our harvest season, which is late September running through the later part of November.

Currently the facility treats the haul roads with emulsified asphalt normally once a year or as needed. This frequency is determined by the location manager once he sees the dust becoming a problem then the emulsified is added more often than once a year.

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

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

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

Source Background and Description

Source Name:	ADM Grain Company
Source Location:	609 N. State Road 66, Rockport, IN 47635
County:	Spencer
SIC Code:	5153
Permit Renewal No.:	M147-28763-00055
Permit Reviewer:	Sarah Conner, Ph. D.

On February 18, 2010, the Office of Air Quality (OAQ) had a notice published in the Journal Democrat, in Rockport, Indiana, stating that ADM Grain Company had applied for a renewal of their Minor Source Operating Permit No. M147-20450-00055, issued on June 30, 2005. The notice also stated that OAQ proposed to issue a Minor Source Operating Permit Renewal for this existing stationary country grain elevator and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

No comments were received during the public notice period.

Additional Changes

IDEM, OAQ has made model changes to some of the B, C and D permit conditions that we believe help to clarify the intent of these conditions. Therefore, IDEM, OAQ has made revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

- (1) IDEM has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timelines have been switched to "no later than" or "not later than".

The permit conditions affected by this change include the following: Condition B.10 (Preventive Maintenance Plan), Condition B.14 (Permit Amendment or Revision), Condition B.18 (Annual Fee Payment), and Condition C.15 (Actions Related to Noncompliance Demonstrated by a Stack Test. The changes made to the conditions are shown with deleted language as ~~strikeouts~~ and new language **bolded**.

"...~~within~~ **no later than**..." or "...~~within~~ **not later than**..."

- (2) IDEM has determined that rather than having a Certification condition and various references throughout the permit as to whether a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so. The certification condition has been removed. All statements to whether a certification, pursuant to the former Section B - Certification is needed or not, have been removed as well. Section B - Credible Evidence and Section C - Asbestos Abatement Projects still require certification as the underlying rules also require certifications.

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

...

- (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).~~

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~~ **an affirmation that the statements in the application are true and complete** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

...

(b)

...

The application which shall be submitted by the Permittee does require ~~the certification~~ **an affirmation that the statements in the application are true and complete** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

...

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

...

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).~~

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

(a) ...

A For performance testing required by this permit, 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.15 Actions Related to Noncompliance Demonstrated by a Stack Test

...

(c)

~~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).~~

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

...

(c) **Reserved** ~~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.1.7 Reporting Requirements

~~... The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (2) IDEM has decided to remove the last sentence dealing with the need for certification from the MSOP Quarterly Report form because the Conditions requiring the form already address this issue. In addition, the MSOP Certification form has been removed from the permit.

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

MSOP Quarterly Report

...

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

~~Attach a signed certification to complete this report.~~

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

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

Source Name: _____ ADM Grain Company
Source Address: _____ 609 N. State Road 66, Rockport, Indiana 47635
Mailing Address: _____ 4666 Faires Parkway, Decatur, IL 62526
MSOP No.: _____ M147-28763-00055 _____

~~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:

- (3) IDEM has added a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans developed. IDEM has decided to clarify other aspects of Section B - Preventive Maintenance Plan.

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

- (a) **A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:** ~~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.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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.**

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

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

The Permittee shall implement the PMPs.

- (bc) 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).~~**
- (ed) 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.**

- (4) IDEM has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.

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

...

- (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, **pursuant to 326 IAC 2-6.1-4 (b)**, in writing by IDEM, OAQ any additional information identified as being needed to process the application.
- (5) IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.

C.3 Opacity [326 IAC 5-1]

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

- (6) IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.

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

The Permittee shall not operate an incinerator ~~or incinerate any waste or refuse~~ except as provided in 326 IAC 4-2 ~~and 326 IAC 9-1-2~~ **or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.**

- (7) IDEM has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.

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

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

- (8) IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.

C.12 **Reserved 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.~~

- (9) IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

C.14 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) ~~Upon detecting an excursion or exceedance,~~ The Permittee shall **take reasonable response steps** to 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 **excess** 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~~ **The response** may include, but ~~are~~ **is** not limited to, the following:
- (1) initial inspection and evaluation;
 - (2) recording that operations returned **or are returning** 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~~ **normal or usual manner of operation.**
- (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 **record** ~~maintain the following records~~ **the reasonable responses steps taken.** :
 - (1) ~~monitoring data;~~
 - (2) ~~monitor performance data, if applicable; and~~
 - (3) ~~corrective actions taken.~~
- (10) IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.

C.15 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 **its** ~~these~~ response actions to IDEM, OAQ, ~~within no later than thirty (30) days of receipt of the test results~~ **seventy-five (75) days after the date of the test.** 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 no later than one hundred~~ **eighty (180)** ~~twenty (120) of receipt of the original test results~~ **days after the date of the test.** Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred **eighty (180)** ~~twenty (120)~~ days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (11) The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]

...

- (b) Unless otherwise specified in this permit, **for all record keeping requirements not already legally required, the Permittee shall be allowed up to ~~shall be implemented within~~ ninety (90) days from the date of permit issuance or ~~ninety (90) days~~ the date of initial start-up, whichever is later, to begin such record keeping.**
- (12) For clarity, IDEM has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to "Section ... contains the Permittee's obligations with regard to the ... required by this condition."

Sections D.1.3 and D.1.5 have been revised to remove the "in accordance with" reference from these conditions.

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.~~ **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.1.5 Monitoring

To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. Section C- Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. **Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

- (13) The word "status" has been added to Section D - Record Keeping Requirements and Section D - Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.

D.1.6 Record Keeping Requirements

- (a) To document **the compliance status** with Condition D.1.1(a) and (b), the Permittee shall maintain monthly records of the grain throughput for the entire source, and for the grain throughput dried.
- (b) To document **the compliance status** with Condition D.1.5, the Permittee shall maintain a log of weekly inspections of the baffle panels.
- (c) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit~~ **contains the Permittee's obligations with regard to the records required by this condition.**

D.1.7 Reporting Requirements

A quarterly summary of the information to document **the compliance status** with Conditions D.1.1(a) shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within~~ **not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.** ~~The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

IDEM Contact

- (a) Questions regarding this proposed Part 70 Operating Permit Renewal can be directed to Sarah Conner, Ph. D. at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6555 or toll free at 1-800-451-6027 extension 4-6555.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

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:	ADM Grain Company
Source Location:	609 N. State Road 66, Rockport, IN 47635
County:	Spencer
SIC Code:	5153
Permit Renewal No.:	M147-28763-00055
Permit Reviewer:	Sarah Conner, Ph. D.

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

History

On December 17, 2009, ADM Grain Company submitted an application to the OAQ requesting to renew its operating permit. ADM Grain Company was issued an initial MSOP No. M147-20450-00055 on June 30, 2005.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) truck receiving operation, identified as EP-1, consisting of the following equipment:
 - (1) One (1) receiving pit, identified as Dump #1, constructed in 2002, receiving a maximum capacity of 18,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (2) One (1) receiving pit, identified as River Dump #2, constructed in 2002, receiving a maximum capacity of 25,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (3) One (1) receiving pit, identified as River Dump #3, constructed in 2002, receiving a maximum capacity of 25,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (4) One (1) receiving pit, identified as Dump #2, constructed in 2005, receiving a maximum capacity of 18,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.

- (b) One (1) completely enclosed internal handling operation, identified as EP-2, consisting of the following equipment:
 - (1) One (1) drag conveyor, identified as Dump #1 Drag Conveyor, constructed in 2002, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (2) One (1) receiving leg, identified as Receiving Leg #1, constructed in 2002, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.

- (3) One (1) bin 10 reclaim conveyor, identified as Bin 10 Reclaim Conveyor, constructed in 2002, with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (4) One (1) bin 20 reclaim, identified as Bin 20 Reclaim, constructed in 2002, with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (5) One (1) bin 30 reclaim, identified as Bin 30 Reclaim, constructed in 2002, with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (6) Two (2) storage bin reclaim conveyors, identified as Bin 15 Reclaim and Bin 25 Reclaim, constructed in 2005, each with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (7) One (1) storage bin fill conveyor, identified as Bin 25 Fill Conveyor, constructed in 2005, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (8) One (1) receiving pit conveyor, identified as Dump #2 Conveyor, constructed in 2005, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (9) One (1) receiving leg, identified as Receiving Leg #2, constructed in 2005, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (10) One (1) enclosed grain distributor, identified as Grain Distributor, constructed in 2005, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (11) One (1) storage bin reclaim conveyor, identified as Bin 26 Reclaim Conveyor, constructed in 2009, with a maximum capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (12) One (1) storage bin fill conveyor, identified as Bin 26 Fill Conveyor, constructed in 2009, with a maximum capacity of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
- (c) One (1) storage area, identified as EP-5, consisting of the following equipment:
- (1) Two (2) storage bins, identified as Bin 10 and Bin 30, constructed in 2002, respectively, with a storage capacity of 111,000 bushels, and exhausting to the atmosphere.
 - (2) One (1) storage bin, identified as Bin 20, constructed in 2002, with a storage capacity of 24,000 bushels, and exhausting to the atmosphere.
 - (3) One (1) storage bin, identified as Bin 25, constructed in 2005, with a storage capacity of 450,000 bushels, and exhausting to the atmosphere.
 - (4) One (1) hopper bin, identified as Bin 15, constructed in 2005, with a storage capacity of 30,900 bushels, and exhausting to the atmosphere.

- (5) One (1) storage bin, identified as Bin 26, constructed in 2009, with a storage capacity of 650,000 bushels, and exhausting to the atmosphere.
- (d) One (1) barge shipping area, equipped with a spout, identified as EP-3, consisting of the following equipment:
 - (1) One (1) shipping conveyor, identified as Shipping Conveyor, constructed in 2002, with a maximum capacity of 25,000 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) barge conveyor, identified as Barge Conveyor, constructed in 2002, with a maximum capacity of 25,000 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) barge loadout, identified as Barge Loadout, constructed in 2002, with a maximum capacity of 25,000 bushels per hour, and exhausting to the atmosphere.
- (e) One (1) truck shipping area, equipped with a sock/sleeve, identified as EP-4, consisting of the following equipment:
 - (1) One (1) bin 20 sidedraw truck loadout, identified as Bin 20 Sidedraw Truck Loadout, constructed in 2002, with a maximum capacity of 6,000 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) leg spout truck loadout, identified as Leg Spout Truck Loadout, constructed in 2002, with a maximum capacity of 18,000 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) bin 15 sidedraw truck loadout, identified as Bin 15 Sidedraw Truck Loadout, constructed in 2005, with a maximum capacity of 6,000 bushels per hour, and exhausting to the atmosphere.
 - (4) One (1) bin 25 sidedraw truck loadout, identified as Bin 25 Sidedraw Truck Loadout, constructed in 2005, with a maximum capacity of 6,000 bushels per hour, and exhausting to the atmosphere.
 - (5) One (1) bin 10 sidedraw truck loadout, identified as Bin 10 Sidedraw Truck Loadout, constructed in 2002, capacity: with a maximum capacity of 6,000 bushels per hour, and exhausting to the atmosphere.
- (f) One (1) 41.6 million British thermal units (MMBtu) per hour natural gas-fired grain dryer, identified as EP-7, constructed in 2006, with a maximum capacity of 4,000 bushels of grain per hour, and exhausting to the atmosphere.
- (g) One (1) dryer conveying area consisting of the following equipment:
 - (1) One (1) conveyor, identified as Wet Drag, constructed in 2006, with a maximum capacity of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) conveyor, identified as Bottom Dry Drag, constructed in 2006, with a maximum capacity of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) conveyor, identified as Top Dry Drag, constructed in 2006, with a maximum capacity of 6,500 bushels per hour, and exhausting to the atmosphere.

- (h) Fugitive emissions from unpaved roads and parking lots. [326 IAC 6-5]

Existing Approvals

Since the issuance of the MSOP No. M147-20450-00055 on June 30, 2005, the source has constructed or has been operating under the following approvals as well:

- (a) Notice-Only Change No. 147-21755-00055 issued on September 26, 2005; and
- (b) Significant Permit Modification No. 147-22412-00055 issued on May 5, 2006; and
- (c) Significant Permit Modification No. 147-26793-00055 issued on January 28, 2009; and
- (d) Notice-Only Change No. 147-27505-00055 issued on March 12, 2009; and
- (e) Notice-Only Change No. 147-27701-00055 issued on April 9, 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 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.

County Attainment Status

The source is located in Spencer County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	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 Ohio Twp for PM2.5. The remainder of Spencer 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. Spencer County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5

U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Spencer County Ohio Township only as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM2.5 promulgated on May 8, 2008, and effective on July 15 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

Spencer County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	257.75
PM ₁₀	83.87
PM _{2.5}	15.42
SO ₂	0.11
VOC	1.00
CO	15.31
NO _x	18.22

HAPs	tons/year
Hexane	0.328
Formaldehyde	0.014
All other Single HAPs	negligible
Total	0.342

- (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, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of Part 70 applicability.

Federal Rule Applicability

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60.300, Subpart DD, are not included in the permit for the country grain elevator because it has a permanent storage capacity less than 2.5 million U.S. bushels. The maximum storage capacity of the country grain elevator is 1,799,334 U.S. bushels. There is 1,399,334 U.S. bushels of permanent storage at the source and 400,000 U.S. bushels of ground pile temporary storage at the source.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

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

State Rule Applicability - Entire Source

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

MSOP applicability is discussed under the Unrestricted Potential Emissions section above.

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

This source has the potential to emit pollutant PM greater than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). In order to render the requirements of 326 IAC 2-2 (PSD) not applicable the source, identified as ADM Grain Company, shall meet the following emission limits:

- (a) The existing stationary grain elevator shall be limited to a throughput of less than 30,000,000 bushels (900,000 tons) of grain per 12 consecutive month period.
- (b) Particulate Matter (PM) emissions for each of the existing stationary grain elevator shall be limited as follows:

Emission Units	Limited Grain Throughput (tons/yr)	PM Emission Limit (lbs PM / ton)	Limited PM Emissions (tons/yr)
Drying	900,000	0.220	99.00
Receiving	900,000	0.15	67.50
Shipping	900,000	0.086	38.70
Handling	900,000	0.061	27.45
Storage	900,000	0.025	11.25

Compliance with the above limits, combined with the potential to emit particulate matter from all other emission units at the source, shall limit particulate matter emissions from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (PSD) not applicable.

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

This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM_{2.5}), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.

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

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

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

The source is subject to the requirements of 326 IAC 6-5, because the unpaved roads have potential fugitive particulate emissions greater than 25 tons per year. Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, submitted on November 12, 2008, which is included as Attachment A to the permit.

State Rule Applicability – Individual Facilities

Grain Elevator Operations

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

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

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

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

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

Emissions Units	Maximum Process Weight (tons/hour) for each unit of that type	326 IAC 6-3 Allowable Emission Rate (lbs/hr) for each unit of that type	Maximum Particulate Emissions before control (lb/hour)
Dump #1	540	69.9	97.2
River Dump #2	750	73.9	135.0
River Dump #3	750	73.9	135.0
Dump #2	540	69.9	97.2
Dump #1 Drag Conveyor	540	69.9	32.9
Receiving Leg #1	540	69.9	32.9
Bin 10 Reclaim Conveyor	600	71.2	36.6
Bin 20 Reclaim	600	71.2	36.6
Bin 30 Reclaim	600	71.2	36.6
Bin 15 Reclaim	600	71.2	36.6
Bin 25 Reclaim	600	71.2	36.6
Bin 25 Fill Conveyor	540	69.9	32.9
Dump #2 Conveyor	540	69.9	32.9
Receiving Leg #2	540	69.9	32.9
Grain Distributor	540	69.9	32.9
Bin 26 Reclaim Conveyor	600	71.2	36.6
Bin 26 Fill Conveyor	540	69.9	32.9

Emissions Units	Maximum Process Weight (tons/hour) for each unit of that type	326 IAC 6-3 Allowable Emission Rate (lbs/hr) for each unit of that type	Maximum Particulate Emissions before control (lb/hour)
Shipping Conveyor	750	73.9	12.0
Barge Conveyor	750	73.9	12.0
Barge Loadout	750	73.9	12.0
Bin 20 Sidedraw Truck	180	57.4	5.2
Leg Spout Truck Loadout	540	69.9	15.7
Bin 15 Sidedraw Truck	180	57.4	5.2
Bin 25 Sidedraw Truck	180	57.4	5.2
Bin 10 Sidedraw Truck	180	57.4	5.2
Grain Dryer	120	53.1	26.4
Wet Drag	195	58.2	11.9
Bottom Dry Drag	195	58.2	11.9
Top Dry Drag	195	58.2	11.9

In order to comply with 326 IAC 6-3 the baffles for particulate control shall be in operation and control emissions from each of the three (3) receiving pits, identified as Dump #1, River Dump #2, and River Dump #3, and the one (1) receiving pit, identified as Dump #2, at all times that the three (3) receiving pits, identified as Dump #1, River Dump #2, and River Dump #3, and the one (1) receiving pit, identified as Dump #2, are in operation.

The one (1) completely enclosed internal handling operation, identified as EP-2, the one (1) barge shipping area, equipped with a spout, identified as EP-3, and the one (1) truck shipping area, equipped with a sock/sleeve identified as EP-4, are able to comply with 326 IAC 6-3 without the use of control devices.

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

The one (1) grain dryer is not subject to the requirements of 326 IAC 6-2, because it is not a source of indirect heating.

Compliance Determination and Monitoring Requirements

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

- (1) In order to comply with Conditions D.1.1 and D.1.2, the baffles for particulate control shall be in operation and control emissions from each of the three (3) receiving pits, identified as Dump #1, River Dump #2, and River Dump #3, and the one (1) receiving pit, identified as Dump #2, at all times that the three (3) receiving pits, identified as Dump #1, River Dump #2, and River Dump #3, and the one (1) receiving pit, identified as Dump #2, are in operation.

- (2) To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. Section C- Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The baffles for the four (4) receiving pits, identified as Dump #1, River Dump #2, River Dump #3, and Dump #2, must operate properly at all times the four (4) receiving pits, identified as Dump #1, River Dump #2, River Dump #3, and Dump #2 are in operation in order to ensure compliance with 326 IAC 2-2 (PSD) and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

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 December 17, 2009. Additional information was received on January 8, 2010 and January 14, 2010.

Conclusion

The operation of this stationary country grain elevator shall be subject to the conditions of the attached MSOP Renewal No. M147-28763-00055.

**Appendix A: Emissions Calculations
Grain Elevator**

Company Name: ADM Grain Company
Address City IN Zip: 609 N. State Road 66, Rockport, IN 47635
Permit Number: M147-28763-00055
Reviewer: Sarah Conner, Ph. D.
Date: 12/22/2009

Grain	bushels/year	¹ lbs / bushel	² Grain Throughput (tons/year)
Grain	30,000,000	60	900,000

Note 1: Assumes 60 lb/bushel for Wheat and Soybeans and 56 lb/bushel for corn; therefore, 60 lb/bushel was used to calculate the maximum PTE.

Note 2: Emissions based on a limited throughput equal to or less than 30,000,000 bushels/grain per year (900,000 tons per year) for receiving (by strait truck and hopper truck), for shipping (by truck and barge), for headhouse and grain handling, and for storage.

Unloading/Receiving					
³ Strait Truck (lb/ton)			³ Hopper Truck		
PM	PM-10	PM2.5	PM	PM-10	PM2.5
0.18	0.059	0.01	0.035	0.0078	0.0013

	Unloading/ Receiving	PM	PM10	PM2.5
PM= 0.15 ⁵	Strait Truck	81.000	26.550	4.500
	Limited Truck	67.500	N/A	N/A
	Hopper Truck	15.750	3.510	0.585
	Total uncontrolled	81.000	26.550	4.500
	⁴ Controlled	32.400	10.620	1.800

Note 3: Assumes that receiving can be done by both strait truck and hopper truck.

Note 4: 60% control efficiency due to baffles in the truck unloading.

Note 5: Pursuant to 326 IAC 2-2, the particulate matter emissions from receiving shall be less than 0.15 pounds of particulate matter per ton of grain received. Compliance with the above limit, combined with the potential to emit particulate matter from all other emission units at the source, shall limit particulate matter emissions from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (PSD) not applicable. In order for the source to comply with the 0.15 lbs/particulate per ton of grain, the baffles for particulate control shall be in operation and control emissions from each of the three (3) receiving pits, identified as Dump #1, River Dump #2, and River Dump #3, and the one (1) receiving pit, identified as Dump #2, at all times that three (3) receiving pits, identified as Dump #1, River Dump #2, and River Dump #3, and the one (1) receiving pit, identified as Dump #2, are in operation.

⁶ Shipping					
Truck (lb/ton)			Barge		
PM	PM-10	PM2.5	PM	PM-10	PM2.5
0.086	0.029	0.0049	0.016	0.004	0.00055

	Shipping	PM	PM10	PM2.5
PM= 0.15 ⁵	Strait Truck	38.700	13.050	2.205
	Barge	7.200	1.800	0.248
	Total uncontrolled	38.700	13.050	2.205

Note 6: Assumes that shipping can be done by both strait truck and barge

Note 7: The AP-42 emission factor for barge shipping was determined with spouts.

Methodology

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

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

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

Drying		
PM	PM-10	PM2.5
0.22	0.055	0.0094

Drying	PM	PM10	PM2.5
Total uncontrolled	99.000	24.750	4.230

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

	PM	PM10	PM2.5
Total uncontrolled	27.450	15.300	2.610
⁸ Controlled (90%)	2.745	1.530	0.261

Note 8: All the conveyors are completely enclosed, but do not vent to a control device. According to the Air Pollution Engineering Manual (Buonicore and Davis, 1992), enclosure of material transfer points and storage piles can result in particulate emission reductions ranging from 70 to essentially 100 percent control, depending on the type of enclosure (partial of full), the type of operation, and whether or not the enclosure is vent is routed to a control device such as a baghouse. In order to be conservative, the control efficiency for handling is estimated at 90%.

Storage		
PM	PM-10	PM2.5
0.025	0.0063	0.0011

storage	PM	PM10	PM2.5
uncontrolled	11.250	2.835	0.495

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

**Company Name: ADM Grain Company
Address City IN Zip: 609 N. State Road 66, Rockport, IN 47635
Permit Number: M147-28763-00055
Reviewer: Sarah Conner, Ph. D.
Date: 12/22/2009**

Heat Input Capacity
MMBtu/hr

41.6

Potential Throughput
MMCF/yr

364.4

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.346	1.385	1.385	0.109	18.221	1.002	15.305

*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

See next page for HAPs emissions calculations.

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

**Company Name: ADM Grain Company
 Address City IN Zip: 609 N. State Road 66, Rockport, IN 47635
 Permit Number: M147-28763-00055
 Reviewer: Sarah Conner, Ph. D.
 Date: 12/22/2009**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.826E-04	2.186E-04	0.0137	0.3280	6.195E-04

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 0.0011	Chromium 0.0014	Manganese 3.8E-04	Nickel 0.0021	Total
Potential Emission in tons/yr	9.110E-05	2.004E-04	2.551E-04	6.924E-05	3.826E-04	0.3439

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name: ADM Grain Company
Address City IN Zip: 609 N. State Road 66, Rockport, IN 47635
Permit Number: M147-28763-00055
Reviewer: Sarah Conner, Ph. D.
Date: 12/22/2009

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (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)	72.0	1.0	72.0	*	2880.0	1848	0.350	25.2	9198.0
Vehicle (leaving plant) (one-way trip)	72.0	1.0	72.0	*	2880.0	1848	0.350	25.2	9198.0
Total			144.0		5760.0			50.4	18396.0

Average Vehicle Weight Per Trip = $\frac{*}{0.35}$ tons/trip
Average Miles Per Trip = $\frac{*}{0.35}$ miles/trip

Unmitigated Emission Factor, $E_f = k[(s/12)^a][(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	6.4	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2)
W =	*	*	*	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f [(365 - P)/365]$

Mitigated Emission Factor, $E_{ext} = E_f [(365 - P)/365]$
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	8.28	2.11	0.27	lb/mile
Mitigated Emission Factor, $E_{ext} =$	5.44	1.39	0.18	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	38.06	9.70	1.26	25.03	6.38	0.83	12.51	3.19	0.41
Vehicle (leaving plant) (one-way trip)	38.06	9.70	1.26	25.03	6.38	0.83	12.51	3.19	0.41
	76.13	19.40	2.51	50.06	12.76	1.65	25.03	6.38	0.83

* Indicates confidential information

Methodology

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

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM 2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit

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

Company Name: ADM Grain Company
Address City IN Zip: 609 N. State Road 66, Rockport, IN 47635
Permit Number: M147-28763-00055
Reviewer: Sarah Conner, Ph. D.
Date: 12/22/2009

Allowable Emissions Under 326 IAC 6-3-2

Emissions Unit Description	Maximum (bushels/hr) for each unit of that type	Maximum Process Weight (tons/hr) for each unit of that type	PM Emission Factor (lbs/ton)	Control Efficiency (%)	PM Emissions Before Control (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr) for each unit of that type	PM Emissions After Control (lbs/hr)
Dump #1	18,000	540	0.18	60%	97.2	69.9	38.9
River Dump #2	25,000	750	0.18	60%	135.0	73.9	54.0
River Dump #3	25,000	750	0.18	60%	135.0	73.9	54.0
Dump #2	18,000	540	0.18	60%	97.2	69.9	38.9
Dump #1 Drag Conveyor	18,000	540	0.061	99%	32.9	69.9	0.3
Receiving Leg #1	18,000	540	0.061	99%	32.9	69.9	0.3
Bin 10 Reclaim Conveyor	20,000	600	0.061	99%	36.6	71.2	0.4
Bin 20 Reclaim	20,000	600	0.061	99%	36.6	71.2	0.4
Bin 30 Reclaim	20,000	600	0.061	99%	36.6	71.2	0.4
Bin 15 Reclaim	20,000	600	0.061	99%	36.6	71.2	0.4
Bin 25 Reclaim	20,000	600	0.061	99%	36.6	71.2	0.4
Bin 25 Fill Conveyor	18,000	540	0.061	99%	32.9	69.9	0.3
Dump #2 Conveyor	18,000	540	0.061	99%	32.9	69.9	0.3
Receiving Leg #2	18,000	540	0.061	99%	32.9	69.9	0.3
Grain Distributor	18,000	540	0.061	99%	32.9	69.9	0.3
Bin 26 Reclaim Conveyor	20,000	600	0.061	99%	36.6	71.2	0.4
Bin 26 Fill Conveyor	18,000	540	0.061	99%	32.9	69.9	0.3
Shipping Conveyor	25,000	750	0.016	90%	12.0	73.9	1.2
Barge Conveyor	25,000	750	0.016	90%	12.0	73.9	1.2
Barge Loadout	25,000	750	0.016	90%	12.0	73.9	1.2
Bin 20 Sidedraw Truck	6,000	180	0.029	90%	5.2	57.4	0.5
Leg Spout Truck Loadout	18,000	540	0.029	90%	15.7	69.9	1.6
Bin 15 Sidedraw Truck	6,000	180	0.029	90%	5.2	57.4	0.5
Bin 25 Sidedraw Truck	6,000	180	0.029	90%	5.2	57.4	0.5
Bin 10 Sidedraw Truck	6,000	180	0.029	90%	5.2	57.4	0.5
Grain Dryer	4,000	120	0.22	N/A	26.4	53.1	26.4
Wet Drag	6,500	195	0.061	N/A	11.9	58.2	11.9
Bottom Dry Drag	6,500	195	0.061	N/A	11.9	58.2	11.9
Top Dry Drag	6,500	195	0.061	N/A	11.9	58.2	11.9

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate is in excess of sixty thousand pounds per hour (30 tons/hr):

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

where

E = rate of emission in pounds per hour

P = process weight rate in tons per hour

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (4/03)

Methodology

Maximum Grain Throughput (tons/hr) = Maximum Grain Throughput (bushels/hr) x 60 (lbs/bushel) x 1 ton/2000 lbs

PTE of PM/PM₁₀ Before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton)

PTE of PM/PM₁₀ After Control (tons/yr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton) x (1- Control Efficiency (%))



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: Miranda Gerard
ADM Grain Company
4666 Faries Pkwy
Decatur, IN 62526

DATE: March 30, 2010

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

SUBJECT: Final Decision
Minor Source Operating Permit Renewal
147-28763-00055

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:
Jeffrey Becker - VP
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

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March 30, 2010

TO: Spencer Co. Public Library

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

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

Applicant Name: ADM Grain Company
Permit Number: 147-28763-00055

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 3/30/2010 ADM Grain Company 147-28763-00055 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	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		Miranda Gerard ADM Grain Company 4666 Faries Pkwy Decatur IN 62526 (Source CAATS) via confirmed delivery										
2		Jeffrey Becker VP ADM Grain Company 4666 Faries Pkwy Decatur IN 62526 (RO CAATS)										
3		Mr. Randy Brown Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
4		Ms. Francis Lueken 223 W. 10th Street, P.O. Box 206 Ferdinand IN 47532 (Affected Party)										
5		Rockport City Council and Mayors Office P.O. Box 151 Rockport IN 47635 (Local Official)										
6		Spencer Co Public Library 210 N Walnut St Rockport IN 47635-1398 (Library)										
7		Ms. Kathy Tretter Dubois-Spencer Counties Publishing Co, Inc P.O. Box 38 Ferdinand IN 47532-0038 (Affected Party)										
8		Spencer County Commissioner/Health Dept. 200 Main Street, Courthouse Rockport IN 47635 (Affected Party)										
9		Spencer County Commissioners 200 Main St., Courthouse Rockport IN 47635 (Local Official)										
10		Spencer County Health Department Main Street Courthouse, 1st Floor, Room 1 Roackport IN 47635-1492 (Health Department)										
11		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
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