



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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Toll Free (800) 451-6027
www.idem.IN.gov

Mr. Kevin Dobin
ConAgra Foods
750 E Drexel Pkwy
Rensselaer, Indiana 47978

May 24, 2010

Re: Permit By Rule Status
073-29163-00030

Dear Kevin Dobin:

On December 15, 1997, ConAgra Foods was issued a Construction Registration No. 073-8966-00030 for a stationary popcorn production facility located at 750 E Drexel Pkwy, Rensselaer, Indiana 47978. On April 13, 2010, ConAgra Foods submitted a letter with supporting data to the Office of Air Quality (OAQ) indicating that the source removed three (3) drying ovens and the three (3) heated process vent blowers for mold release in 2008 and now satisfies the criteria to operate under the provisions of 326 IAC 2-10 (Permit by Rule). Based on the data and information submitted and the provisions of 326 IAC 2-10 (Permit by Rule), ConAgra, is now operating under Permit by Rule (PBR) Status. This PBR supersedes Registration No. 073-8966-00030, issued on December 15, 1997.

Pursuant to 326 IAC 2-5.5-2(b) ConAgra Foods should have applied for a Registration no later than December 25, 2000. IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the compliance schedule rules.

Pursuant to 326 IAC 2-10 (Permit by Rule), this source shall comply with the following conditions:

- (a) The source limits actual emissions for every twelve (12) month period to less than twenty percent (20%) of any threshold for the following:
 - (1) A major source of regulated air pollutants, as defined by 326 IAC 2-7-1(22) (i.e., one hundred (100) tons per year of any regulated air pollutant, in all areas except areas classified as serious, severe, and extreme nonattainment for ozone). [326 IAC 2-10-3.1(1)(A)]
 - (2) A major source of hazardous air pollutants (HAPs), as defined in Section 112 of the Clean Air Act (i.e., ten (10) tons per year of any individual HAP or twenty-five (25) tons per year of any combination of HAPs). [326 IAC 2-10-3.1(1)(B)]
- (b) The source shall not rely on air pollution control equipment to comply with the above-mentioned limitations. [326 IAC 2-10-3.1(2)]
- (c) Not later than thirty (30) days after receipt of written request by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), or U.S. Environmental Protection Agency (EPA), the owner or operator shall demonstrate that the source is in compliance with the above-mentioned conditions. [326 IAC 2-10-4.1]

**Appendix A: Emission Calculations
PM and PM10 Emissions
Grain Handling, Receiving, Storing and Processing**

**Company Name: ConAgra Foods, Inc.
Address: 750 E Drexel Pkwy, Rensselaer, Indiana 47978
Permit By Rule 073-29163-00030
Reviewer: Marcia Earl
Date: April 2010**

Potential To Emit (tons/year)

Operation Description	Max. Throughput Rate (tons/hr)	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	PM2.5 Emission Factor (lbs/ton)	PTE PM Emission (tons/year)	PTE of PM10 (tons/year)	PTE of PM2.5 (tons/year)	Control Efficiency (75%)	Controlled PTE PM Emissions (tons/year)	Controlled PTE PM10 Emissions (tons/year)	Controlled PTE PM2.5 Emissions (tons/year)
Corn Receiving Aspirator*	20.0	0.075	0.019	0.0032	6.57	1.66	0.28		6.57	1.66	0.28
Bulk Corn Receiver	20.0	0.061	0.034	0.0058	5.34	2.98	0.51	75.00%	1.34	0.74	0.13
Bulk Corn Storage Bins	20.0	0.025	0.0063	0.0011	2.19	0.55	0.10	75.00%	0.55	0.14	0.02
Popcorn Processing	3.75	0.061	0.034	0.0058	1.00	0.56	0.10	75.00%	0.25	0.14	0.02
Total					15.11	5.75	0.98		8.70	2.69	0.46

*Emission factors include control with a cyclone

Note: Emission factors are from AP-42, Chapter 9.9.1 - Grain Elevators, Table 9.9.1-1 (03/03).

Methodology

Unlimited PTE of PM/PM10/PM2.5 (tons/yr) = Max. Throughput Rate (tons/hr) x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs

Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr) = PM/PM10/PM2.5 emissions (tons/year) x (1- control efficiency)

Actual Throughput Rate (tons/year)

Operation Description	Actual Throughput Rate (tons/hr)	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	PM2.5 Emission Factor (lbs/ton)	Actual PM Emissions (tons/yr)	Actual PM10 Emissions (tons/yr)	Actual PM2.5 Emissions (tons/yr)	Control Efficiency (75%)	Controlled PTE PM Emissions (tons/year)	Controlled PTE PM10 Emissions (tons/year)	Controlled PTE PM2.5 Emissions (tons/year)
Corn Receiving Aspirator*	4.70	0.075	0.019	0.0590	1.54	0.39	1.21		1.54	0.39	1.21
Bulk Corn Receiver	4.70	0.061	0.034	0.0550	1.26	0.70	1.13	75.00%	0.31	0.17	0.28
Bulk Corn Storage Bins	4.70	0.025	0.006	0.0011	1.26	0.13	0.02	75.00%	0.31	0.03	0.01
Popcorn Processing	4.70	0.061	0.034	0.0063	1.26	0.70	0.13	75.00%	0.31	0.17	0.03
Total					5.31	1.92	2.50		2.49	0.77	1.54

*Emission factors include control with a cyclone

Note: Emission factors are from AP-42, Chapter 9.9.1 - Grain Elevators, Table 9.9.1-1 (03/03).

Methodology

Actual uncontrolled PTE of PM/PM10/PM2.5 (tons/yr) = Actual Throughput (tons/hr) x PM/PM10/PM2.5 Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs

Actual controlled PTE of PM/PM10/PM2.5 (tons/yr) = Actual Throughput (tons/hr) x controlled PM/PM10/PM2.5 emission (tons/year) x (1-control efficiency)

Mail Code 61-53

IDEM Staff	CDENNY 5/24/2010 ConAgra Foods 073-29163-00030 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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											Remarks
1		Kevin Dobin ConAgra Foods 750 E Drexel Pkwy Rensselaer IN 47978 (Source CAATS)									
2		Mr. Charles L. Berger Attorney Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)									
3		Jasper County Commissioners 115 W. Washington Street Rensselaer IN 47978 (Local Official)									
4		Jasper County Health Department 105 W. Kellner St Rensselaer IN 47978-2623 (Health Department)									
5		Mr. Kenny Haun P.O. Box 280 Rensselaer IN 47978 (Affected Party)									
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