



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: December 28, 2010

RE: Cargill AgHorizons – Linden Grain Elevator / 107-29227-00009

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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## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Cargill AgHorizons - Linden Grain Elevator**  
**173 West County Road 1100 North**  
**Linden, Indiana 47955**

(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.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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 FESOP under 326 IAC 2-8.

Operation Permit No.: F107-29227-00009	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 28, 2010 Expiration Date: December 28, 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 through A.3 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 2-8-3(b)]

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The Permittee owns and operates a stationary grain elevator, where grain means corn, wheat, sorghum, rice, rye, oats, barley, and soybeans.

Source Address:	173 West County Road 1100 North, Linden, IN 47955
General Source Phone Number:	(765) 339-7251
SIC Code:	5153
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

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The following two (2) companies are located at the same location:

- (a) Cargill AgHorizons – Linden Grain Elevator (Plant ID #107-00009), an existing grain elevator (SIC 5153), which started operation in 1972.
- (b) Valero Renewable Fuels Company, LLC - Valero Linden Plant (Plant ID #107-00061), an ethanol production plant (SIC 2869). All the grain received at the ethanol plant will be from Cargill AgHorizons - Linden Grain Elevator.

Since these two (2) plants are located on adjacent property and have a supporting relationship, IDEM, OAQ has determined that these two (2) plants should be considered one (1) source for purposes of determining the potential to emit regulated air pollutants and applicable requirements under the Clean Air Act (as amended by the 1990 Clean Air Act Amendments), Title 40 of the Code of Federal Regulations (CFR), and Title 326 of the Indiana Administrative Code (IAC). Separate FESOPs have been issued to Plant #107-00009 and #107-00061 solely for administrative purposes. This permit covers the Cargill AgHorizons - Linden Grain Elevator plant (#107-00009).

### A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

---

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

- (a) One (1) grain receiving operation, identified as EU101, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:
  - (1) One (1) truck dump pit, with a maximum capacity of 840 tons of grain per hour.
  - (2) One (1) truck/railcar dump pit, with a maximum capacity of 840 tons of grain per hour.

Under NSPS, Subpart DD, the grain receiving operation EU101 is considered a grain loading station.

- (b) One (1) grain leg handling system, identified as EU102, constructed in 1972 and modified in 2007 and 2010, controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of the following:
  - (1) Two (2) enclosed transfer legs associated with the grain dump pits, identified as Leg 1 and Leg 2, each with a maximum throughput rate of 840 tons of grain per hour.
  - (2) Two (2) enclosed transfer legs associated with the grain dryer, identified as Leg 3 and Leg 4, each with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the grain leg handling system EU102 is considered an affected grain handling operation.

- (c) One (1) enclosed conveyor system, identified as EU103, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of the following:
  - (1) Four (4) enclosed conveyors, identified as C1, C2, C7, and C9, each with a maximum throughput rate of 840 tons of grain per hour.
  - (2) Five (5) enclosed conveyors which transfers grain to Valero Renewable Fuels Company, LLC - Valero Linden Plant, identified as EC1 through EC5, with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the enclosed conveyor system EU103 is considered an affected grain handling operation.

- (d) One (1) drag conveyor system, identified as EU104, constructed in 1972 and modified in 2007 and 2010, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of six (6) enclosed drag conveyors (identified as Dry Drag 1 through Dry Drag 4, Wet Drag 1 and Wet Drag 2), each with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the drag conveyor system EU104 is considered an affected grain handling operation.

- (e) Seven (7) headhouse storage bins and one (1) metal storage tank, identified as EU105, constructed in 1972, with a total storage capacity of 725,625 bushels, and with a total maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.
- (f) Eight (8) annex storage bins, identified as EU106, constructed in 1979, with a total storage capacity of 557,800 bushels and with a total maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the annex storage bins identified as EU106 are considered an affected grain handling operation.

- (g) One (1) natural gas-fired column grain dryer, identified as EU100, constructed in 2010, with a maximum heat input capacity of 108 MMBtu/hr and a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the natural gas-fired column grain dryer is considered an affected facility.

- (h) Three (3) metal storage tanks, identified as FS104, constructed in 1972, with a total storage capacity of 1,850 bushels and a maximum total throughput rate of 560 tons of grain per hour.
- (i) Three (3) storage tank conveyors, identified as FS103, constructed in 1972, each with a maximum throughput rate of 560 tons of grain per hour.
- (j) One (1) grain loadout operation, identified as EU108, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:
  - (1) One (1) railcar loadout operation, with a maximum throughput rate of 1,120 tons of grain per hour.
  - (2) One (1) truck loadout operation, with a maximum throughput rate of 840 tons of grain per hour.

Under NSPS, Subpart DD, the grain loadout operation EU108 is considered an affected grain unloading station.

- (k) One (1) tank reclaim conveyor, identified as C5, constructed in 1972 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.

Under NSPS, Subpart DD, the reclaim conveyor C5 is considered an affected grain handling operation.

- (l) One (1) annex bin reclaim conveyor, identified as C8, constructed in 1979 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the reclaim conveyor C8 is considered an affected grain handling operation.

- (m) One (1) enclosed headhouse distributor, identified as EU113, constructed in 1972 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the headhouse distributor EU113 is considered an affected grain handling operation.

- (n) One (1) enclosed annex distributor, identified as EU114, constructed in 1979 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the annex distributor EU114 is considered an affected grain handling operation.

A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities:

- (a) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (c) Paved roads and parking lots with public access.
- (d) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:

Outdoor grain storage, identified as EU111, with a total maximum throughput rate of 1,680,000 tons/yr, consisting of:

- (1) Three (3) outdoor grain storage piles; and
- (2) Multiple grain storage bags.

A.5 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, F107-29227-00009, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

### B.5 Severability [326 IAC 2-8-4(4)]

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

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

- (b) The annual compliance certification report 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) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.12 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile 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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F107-29227-00009 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months 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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.19 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a FESOP 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) 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.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### 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]**

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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]**

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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]**

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

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

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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 Stack Height [326 IAC 1-7]**

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

**C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.10 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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.12 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for 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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

#### **C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

---

- (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 [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

#### **C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

#### **C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

---

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.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

- (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.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (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.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

- (c) 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.
- (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.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) grain receiving operation, identified as EU101, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:

- (1) One (1) truck dump pit, with a maximum capacity of 840 tons of grain per hour.
- (2) One (1) truck/railcar dump pit, with a maximum capacity of 840 tons of grain per hour.

Under NSPS, Subpart DD, the grain receiving operation EU101 is considered a grain loading station.

- (b) One (1) grain leg handling system, identified as EU102, constructed in 1972 and modified in 2007 and 2010, controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of the following:

- (1) Two (2) enclosed transfer legs associated with the grain dump pits, identified as Leg 1 and Leg 2, each with a maximum throughput rate of 840 tons of grain per hour.
- (2) Two (2) enclosed transfer legs associated with the grain dryer, identified as Leg 3 and Leg 4, each with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the grain leg handling system EU102 is considered an affected grain handling operation.

- (c) One (1) enclosed conveyor system, identified as EU103, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of the following:

- (1) Four (4) enclosed conveyors, identified as C1, C2, C7, and C9, each with a maximum throughput rate of 840 tons of grain per hour.
- (2) Five (5) enclosed conveyors which transfers grain to Valero Renewable Fuels Company, LLC - Valero Linden Plant, identified as EC1 through EC5, with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the enclosed conveyor system EU103 is considered an affected grain handling operation.

- (d) One (1) drag conveyor system, identified as EU104, constructed in 1972 and modified in 2007 and 2010, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of six (6) enclosed drag conveyors (identified as Dry Drag 1 through Dry Drag 4, Wet Drag 1 and Wet Drag 2), each with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the drag conveyor system EU104 is considered an affected grain handling operation.

- (e) Seven (7) headhouse storage bins and one (1) metal storage tank, identified as EU105, constructed in 1972, with a total storage capacity of 725,625 bushels, and with a total maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1,

with emissions exhausted through Stack EP110.

- (f) Eight (8) annex storage bins, identified as EU106, constructed in 1979, with a total storage capacity of 557,800 bushels and with a total maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the annex storage bins identified as EU106 are considered an affected grain handling operation.

- (g) One (1) natural gas-fired column grain dryer, identified as EU100, constructed in 2010, with a maximum heat input capacity of 108 MMBtu/hr and a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the natural gas-fired column grain dryer is considered an affected facility.

- (h) Three (3) metal storage tanks, identified as FS104, constructed in 1972, with a total storage capacity of 1,850 bushels and a maximum total throughput rate of 560 tons of grain per hour.

- (i) Three (3) storage tank conveyors, identified as FS103, constructed in 1972, each with a maximum throughput rate of 560 tons of grain per hour.

- (j) One (1) grain loadout operation, identified as EU108, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:

(1) One (1) railcar loadout operation, with a maximum throughput rate of 1,120 tons of grain per hour.

(2) One (1) truck loadout operation, with a maximum throughput rate of 840 tons of grain per hour.

Under NSPS, Subpart DD, the grain loadout operation EU108 is considered an affected grain unloading station.

- (k) One (1) tank reclaim conveyor, identified as C5, constructed in 1972 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.

Under NSPS, Subpart DD, the reclaim conveyor C5 is considered an affected grain handling operation.

- (l) One (1) annex bin reclaim conveyor, identified as C8, constructed in 1979 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the reclaim conveyor C8 is considered an affected grain handling operation

- (m) One (1) enclosed headhouse distributor, identified as EU113, constructed in 1972 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the headhouse distributor EU113 is considered an affected grain handling operation.

(n) One (1) enclosed annex distributor, identified as EU114, constructed in 1979 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the annex distributor EU114 is considered an affected grain handling operation.

(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 2-8-4(1)]**

**D.1.1 PSD Minor Limitations [326 IAC 2-2]**

- (a) The PM emissions from the grain receiving (EU101), handling (EU102 - EU106, C8, C5, EU113, and EU114), and loadout (EU108) operations shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	Control Device	PM Emission Limit (lbs/hr) Utilizing Baghouse	PM Emission Limit (lbs/hr) No Baghouse
EU101	Grain Receiving	Baghouse BH1	0.58	58.29
EU102 EU103 EU104 C8 EU113 EU114	Grain Handling			
EU105 EU106	Grain Storage			
EU108	Grain Loadout			
C5	Tank Reclaim Conveyor			

Note: \*Tank Reclaim Conveyor C5 is fully enclosed and located underground. When Baghouse BH2 is not in operation, there are no emission point exhausts from this unit.

- (b) Combined PM emissions from emission units EU101 through EU106, EU108, C8, EU113, and EU114 shall be less than 2.55 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Note: The Grain Receiving, Grain Handling, Grain Storage, and Grain Loadout operations may operate while utilizing Baghouse BH1 or without the use of the baghouse. At no time shall the combined emissions for these operations exceed 2.55 tons per year. To ensure compliance with this limit, the source shall determine emissions according to the formula identified in Condition D.1.5.

- (c) The Permittee shall comply with the following throughput rate limits:

Unit ID	Unit Description	Throughput Limits (tons of grain per twelve (12) consecutive month period)
FS104	Grain Storage Tanks	700,000
FS103	Storage Tank Conveyors	700,000
EU100	Grain Dryer	420,000

In conjunction with the above mentioned limits, the Permittee shall comply with the following emission limitations for PM emissions:

Unit ID	Unit Description	PM Emission Limit (lbs/ton)
FS104	Grain Storage Tanks	0.025
FS103	Storage Tank Conveyors	0.061
EU100	Grain Dryer	0.22

Compliance with these limits, combined with the potential to emit PM from all other emission units from this source (Plant ID #107-00009) and the potential to emit PM from Valero Renewable Fuels Company, LLC - Valero Linden Plant (Plant ID #107-00061), shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

**D.1.2 FESOP Limitations [326 IAC 2-8-4] [326 IAC 2-2]**

The Permittee shall comply with the following limits:

- (a) The PM10 and PM2.5 emissions from the grain receiving (EU101), handling (EU102 - EU106, C8, C5, EU113, and EU114), and loadout (EU108) operations shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	Control Device	PM10 Emission Limit (lbs/hr) Utilizing Baghouse	PM2.5 Emission Limit (lbs/hr) Utilizing Baghouse	PM10 Emission Limit (lbs/hr) No Baghouse	PM2.5 Emission Limit (lbs/hr) No Baghouse
EU101	Grain Receiving	Baghouse BH1	0.58	0.58	58.29	58.29
EU102	Grain Handling					
EU103						
EU104						
C8						
EU113	Grain Storage					
EU114						
EU105	Grain Loadout					
EU106						
EU108	Tank Reclaim Conveyor	Baghouse BH2	0.43	0.43	N/A*	N/A*

Note: \*Tank Reclaim Conveyor C5 is fully enclosed and located underground. When Baghouse BH2 is not in operation, there are no emission point exhausts from this unit.

- (b) The combined PM10 and PM2.5 emissions from emission units EU101 through EU106, EU108, C8, EU113, and EU114 shall be less than 2.55 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Note: The Grain Receiving, Grain Handling, Grain Storage, and Grain Loadout operations may operate while utilizing Baghouse BH1 or without the use of the baghouse. At no time shall the combined emissions for these operations exceed 2.55 tons per year. To ensure compliance with this limit, the source shall determine emissions according to the formula identified in Condition D.1.5.

(c) The Permittee shall comply with the following throughput rate limits:

Unit ID	Unit Description	Throughput Limits (tons of grain per twelve (12) consecutive month period)
FS104	Grain Storage Tanks	700,000
FS103	Storage Tank Conveyors	700,000
EU100	Grain Dryer	420,000

In conjunction with the above mentioned limits, the Permittee shall comply with the following emission limitations for PM10 and PM2.5 emissions:

Unit ID	Unit Description	PM10 Emission Limit (lbs/ton)	PM2.5 Emission Limit (lbs/ton)
FS104	Grain Storage Tanks	0.0063	0.0063
FS103	Storage Tank Conveyors	0.0340	0.0340
EU100	Grain Dryer	0.0550	0.0550

- (d) The amount of natural gas combusted in the grain dryer (EU100) shall not exceed 80 million cubic feet (MMCF) per twelve (12) consecutive month period with compliance determined at the end of each month.
- (e) NOx emissions from the grain dryer (EU100) shall not exceed 100 pounds per million cubic foot (lbs/MMCF).
- (f) CO emissions from the grain dryer (EU100) shall not exceed 84 pounds per million cubic foot (lbs/MMCF).

Compliance with these limits, combined with the potential to emit PM, PM10, PM2.5, NOx, and CO from all other emission units from this source (Plant ID #107-00009) and the potential to emit PM and PM10 from Valero Renewable Fuels Company, LLC - Valero Linden Plant (Plant ID #107-00061), shall limit the source-wide total potential to emit of PM10, PM2.5, NOx, and CO to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

**D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]**

The Permittee shall comply with the following limits:

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of following operations shall not exceed the pound per hour limits listed in the table below:

Unit ID	Unit Description	Maximum Throughput Rate (tons/hr)	Control Device	326 IAC 6-3-2 Total Allowable Particulate Emission Rate (lbs/hr)
EU101	Dump Pit 1	840	Baghouse BH1	75.35
	Dump Pit 2	840		75.35
EU102	Grain Leg 1	840		75.35
	Grain Leg 2	840		75.35
	Grain Leg 3	420		66.89
	Grain Leg 4	420		66.89
EU103	Enclosed Conveyor C1	840		75.35
	Enclosed Conveyor C2	840		75.35
	Enclosed Conveyor C7	840		75.35
	Enclosed Conveyor C9	840		75.35
	Enclosed Conveyors EC1-EC5	420		66.89 (each)
EU104	Dry Drag 1	420		66.89
	Dry Drag 2	420		66.89
	Dry Drag 3	420		66.89
	Dry Drag 4	420		66.89
	Wet Drag 1	420		66.89
	Wet Drag 2	420		66.89
EU105	Headhouse Storage Bins 1-7 and one (1) metal storage tank	840		75.35 (each)
EU106	Annex Storage Bins 8-15	840		75.35 (each)
EU108	Railcar Grain Loadout Station	1,120		79.06
	Truck Grain Loadout Station	840	75.35	
C8	Annex Bin Reclaim Conveyor	840	75.35	
EU113	Headhouse Distributor	840	75.35	
EU114	Annex Distributor	840	75.35	
C5	Tank Reclaim Conveyor	840	Baghouse BH2	75.35
EU100	Grain Dryer	420	N/A	66.89
FS104	Each Metal Storage Tank	560	N/A	70.32 (each)
FS103	Each Storage Tank Conveyor	560	N/A	70.32 (each)

The pounds per hour limitations were calculated using the following equation:

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

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

Pursuant to 326 IAC 6-3-2(e)(3), when the process weight exceeds 200 tons per hour, the maximum allowable emission may exceed the emission limits shown in the table above, provided the concentration of particulate matter in the gas discharged to the atmosphere is less than 0.10 pounds per 1,000 pounds of gases.

**D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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.1.5 Particulate Emissions

In order to ensure compliance with Conditions D.1.1(b) and D.1.2(b), the Permittee shall determine particulate emissions from emission units EU101 through EU106, EU108, C8, EU113, and EU114, according to the following formula:

$$E = \frac{U(PT_U) + C(PT_C)}{2,000 \text{ lbs/ton}}$$

where:

- E = Tons of particulate emissions for a 12-month consecutive period
- U = Uncontrolled Emission Rate (0.036 lb/ton) or the emission factor determined from the most recent valid stack test
- C = Controlled Emission Rate (0.000364 lb/ton) or the emission factor determined from the most recent valid stack test
- PT<sub>U</sub> = Production Throughput (tons) while Baghouse BH1 is not operated
- PT<sub>C</sub> = Production Throughput (tons) while Baghouse BH1 is operated

### D.1.6 Particulate Control

- (a) The Permittee shall operate baghouses BH1 and BH2, which control the below listed emission units, as necessary, in order to ensure compliance with Conditions D.1.1, D.1.2(a), D.1.2(b), and D.1.2(c).

Unit ID	Unit Description	Baghouse ID	Stack ID
EU101	Each Dump Pit	BH1	EP110
EU102	Grain Leg Handling	BH1	EP110
EU103	Enclosed Conveyor System	BH1	EP110
EU104	Drag Conveyor System	BH1	EP110
EU105	Each Headhouse Storage Bin and one (1) metal storage tank	BH1	EP110
EU106	Each Annex Storage Bin	BH1	EP110
EU108	Each Grain Loadout Station	BH1	EP110
C8	Annex Bin Reclaim Conveyor	BH1	EP110
C5	Tank Reclaim Conveyor	BH2	EP120
EU113	Headhouse Distributor	BH1	EP110
EU114	Annex Distributor	BH1	EP110

- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Conditions D.1.1(a) and D.1.1(b), the Permittee shall perform PM, testing for baghouses BH1 and BH2 not later than five (5) years after the date of the most recent valid compliance demonstration, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.
- (b) In order to demonstrate compliance with Conditions D.1.2(a) and D.1.2(b), the Permittee shall perform PM10 and PM2.5 testing for baghouses BH1 and BH2 not later than five (5) years after the date of the most recent valid compliance demonstration, or within one hundred eighty (180) days of publication of the new or revised condensible PM test

method(s) referenced in the U.S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM<sub>2.5</sub>), signed on May 8th, 2008, whichever is later, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. PM-10 and PM-2.5 includes filterable and condensible PM-10 and PM-2.5.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM-10 and PM<sub>2.5</sub> includes filterable and condensible particulate matter.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **D.1.8 Visible Emissions Notations**

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The Permittee shall comply with the following:

- (a) Visible emission notations of the baghouse stack exhausts (stacks EP110 and EP120) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. 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.1.9 Parametric Monitoring**

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The Permittee shall record the pressure drop across each of the baghouses (BH1 and BH2) used in conjunction with the grain receiving operation (EU101), the grain handling operations (EU102 through EU106, C8, C5, EU113, and EU114) and the grain loadout operation (EU108), at least once per day when these units are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

#### D.1.10 Broken or Failed Bag Detection

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

#### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.11 Record Keeping Requirements

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- (a) To document the compliance status with Conditions D.1.1(b) and D.1.2(b), the Permittee shall maintain monthly records of the following:
  - (1) The maximum amount of grain processed (tons) through emission units EU101 through EU108, C8, EU113, and EU114 during periods with the use of baghouse BH1 (controlled).
  - (2) The maximum amount of grain processed (tons) through emission units EU101 through EU108, C8, EU113, and EU114 during periods without the use of baghouse BH1 (uncontrolled).
- (b) To document the compliance status with Conditions D.1.1(c) and D.1.2(c), the Permittee shall maintain monthly records of the following:
  - (1) The amount of grain stored in the grain storage tanks (FS104);
  - (2) The amount of grain handled in the storage tank conveyors (FS103); and
  - (3) The amount of grain input to the grain dryer (EU100).
- (c) To document the compliance status with Condition D.1.2(d), the Permittee shall maintain monthly records of natural gas usage in the grain dryer (EU100).
- (d) To document the compliance status with Condition D.1.8, the Permittee shall maintain a daily record of visible emission notations for each of the baghouse stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (e) To document the compliance status with Condition D.1.9, the Permittee shall maintain a daily record of pressure drop for each of the baghouses during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

- (f) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the recordkeeping requirements of this requirement.

#### D.1.12 Reporting Requirements

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A quarterly summary of the information to document the compliance status with Conditions D.1.1(b), D.1.1(c), D.1.2(b), D.1.2(c), and D.1.2(d) 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION E.1 SOURCE OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) grain receiving operation, identified as EU101, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:
- (1) One (1) truck dump pit, with a maximum capacity of 840 tons of grain per hour.
  - (2) One (1) truck/railcar dump pit, with a maximum capacity of 840 tons of grain per hour.
- Under NSPS, Subpart DD, the grain receiving operation EU101 is considered an affected grain loading station.
- (b) One (1) grain leg handling system, identified as EU102, constructed in 1972 and modified in 2007 and 2010, controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of the following:
- (1) Two (2) enclosed transfer legs associated with the grain dump pits, identified as Leg 1 and Leg 2, each with a maximum throughput rate of 840 tons of grain per hour.
  - (2) Two (2) enclosed transfer legs associated with the grain dryer, identified as Leg 3 and Leg 4, each with a maximum throughput rate of 420 tons of grain per hour.
- Under NSPS, Subpart DD, the grain leg handling system EU102 is considered an affected grain handling operation.
- (d) One (1) drag conveyor system, identified as EU104, constructed in 1972 and modified in 2007 and 2010, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of six (6) enclosed drag conveyors (identified as Dry Drag 1 through Dry Drag 4, Wet Drag 1 and Wet Drag 2), each with a maximum throughput rate of 420 tons of grain per hour.
- Under NSPS, Subpart DD, the drag conveyor system EU104 is considered an affected grain handling operation.
- (f) Eight (8) annex storage bins, identified as EU106, constructed in 1979, with a total storage capacity of 557,800 bushels and with a total maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.
- Under NSPS, Subpart DD, the annex storage bins identified as EU106 are considered an affected grain handling operation.
- (g) One (1) natural gas-fired column grain dryer, identified as EU100, constructed in 2010, with a maximum heat input capacity of 108 MMBtu/hr and a maximum throughput rate of 420 tons of grain per hour.
- Under NSPS, Subpart DD, the natural gas-fired column grain dryer is considered an affected facility.
- (j) One (1) grain loadout operation, identified as EU108, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:
- (1) One (1) railcar loadout operation, with a maximum throughput rate of 1,120 tons of grain per hour.
  - (2) One (1) truck loadout operation, with a maximum throughput rate of 840 tons of grain per hour.

Under NSPS, Subpart DD, the grain loadout operation EU108 is considered an affected grain unloading station.

- (k) One (1) tank reclaim conveyor, identified as C5, constructed in 1972 and modified in 2007 with a maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.

Under NSPS, Subpart DD, the reclaim conveyor C5 is considered an affected grain handling operation.

- (l) One (1) annex bin reclaim conveyor, identified as C8, constructed in 1979 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the reclaim conveyor C8 is considered an affected grain handling operation

- (m) One (1) enclosed headhouse distributor, identified as EU113, constructed in 1972 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the headhouse distributor EU113 is considered an affected grain handling operation.

- (n) One (1) enclosed annex distributor, identified as EU114, constructed in 1979 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the annex distributor EU114 is considered an affected grain handling operation.

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

### **New Source Performance Standards (NSPS) Requirements**

#### **E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]**

Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, except as otherwise specified in 40 CFR Part 60, Subpart DD.

#### **E.1.2 Standards of Performance for Grain Elevators [40 CFR Part 60, Subpart DD] [326 IAC 12]**

Pursuant to 40 CFR Part 60, Subpart DD, the Permittee shall comply with the provisions of Standards of Performance for Grain Elevators, which are incorporated by reference as 326 IAC 12, for the column grain dryer (EU100), grain receiving operation (EU101), the grain handling operation (EU102 through EU104, EU106, C8, C5, EU113, and EU114), and the grain loadout operation (EU108):

- (1) 40 CFR 60.300
- (2) 40 CFR 60.301
- (3) 40 CFR 60.302
- (4) 40 CFR 60.303
- (5) 40 CFR 60.304

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Cargill AgHorizons - Linden Grain Elevator  
Source Address: 173 West County Road 1100 North, Linden, Indiana 47955  
FESOP Permit No.: F107-29227-00009

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)\_\_\_\_\_
- Report (specify)\_\_\_\_\_
- Notification (specify)\_\_\_\_\_
- Affidavit (specify)\_\_\_\_\_
- Other (specify)\_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Cargill AgHorizons - Linden Grain Elevator  
Source Address: 173 West County Road 1100 North, Linden, Indiana 47955  
FESOP Permit No.: F107-29227-00009

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Page 1 of 2

**Source Name:** Cargill AgHorizons – Linden Grain Elevator  
**Source Address:** 173 West, Country Road 1100 North, Linden, Indiana 47955  
**FESOP No.:** 107-29227-00009  
**Facility:** EU101 through EU108, C8, EU113, and EU114  
**Parameter:** PM/PM10/PM2.5 Emissions  
**Limit:** Combined PM/PM10/PM2.5 emissions from emission units EU101 through EU108, C8, EU113, and EU114 shall be less than 2.55 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

The Permittee shall determine particulate emissions from emission units EU101 through EU108, C8, EU113, and EU114 according to the following formula:

$$E = \frac{U(PT_U) + C(PT_C)}{2,000 \text{ lbs/ton}}$$

where:

- E = Tons of particulate emissions for a 12-month consecutive period
- U = Uncontrolled Emission Rate (0.036 lb/ton) or the emission factor determined from the most recent valid stack test
- C = Controlled Emission Rate (0.000364 lb/ton) or the emission factor determined from the most recent valid stack test
- PT<sub>U</sub> = Production Throughput (tons) while Baghouse BH1 is not operated
- PT<sub>C</sub> = Production Throughput (tons) while Baghouse BH1 is operated

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

Month	Column 1 This Month			Column 2 Previous 11 Months			Column 1 + Column 2 12 Month Total		
	Process Throughput		Emissions	Process Throughput		Emissions	Process Throughput		Emissions
	Controlled (tons)	Uncontrolled (tons)	(tons/yr)	Controlled (tons)	Uncontrolled (tons)	(tons/yr)	Controlled (tons)	Uncontrolled (tons)	(tons/yr)
Month 1									
Month 2									
Month 3									

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Cargill AgHorizons – Linden Grain Elevator  
 Source Address: 173 West, Country Road 1100 North, Linden, Indiana 47955  
 FESOP No.: 107-29227-00009  
 Facility: Metal Storage Tanks (FS104) and Storage Tank Conveyors (FS103)  
 Parameter: Total Grain Stored and Conveyed (each)  
 Limit: Shall not exceed 700,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	Stored	Conveyed	Stored	Conveyed	Stored	Conveyed
Month 1						
Month 2						
Month 3						

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Cargill AgHorizons – Linden Grain Elevator  
Source Address: 173 West, Country Road 1100 North, Linden, Indiana 47955  
FESOP No.: 107-29227-00009  
Facility: Grain Dryer (EU100)  
Parameter: Total Grain Processed  
Limit: Shall not exceed 420,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Cargill AgHorizons – Linden Grain Elevator  
Source Address: 173 West, Country Road 1100 North, Linden, Indiana 47955  
FESOP No.: 107-29227-00009  
Facility: Grain Dryer (EU100)  
Parameter: Natural Gas Usage  
Limit: Less than 80 MMCF per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Cargill AgHorizons - Linden Grain Elevator  
 Source Address: 173 West County Road 1100 North, Linden, Indiana 47955  
 FESOP Permit No.: F107-29227-00009

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Indiana Department of Environmental Management  
Office of Air Quality

Attachment A

**1.0 SOURCE INFORMATION**

Source Name:	Cargill AgHorizons – Linden Grain Elevator
Source Address:	173 West County Road 1100 North Linden, Indiana 47955
Plan Contact:	Jim Simpson / Source Address

**2.0 FUGITIVE DUST CONTROL PLAN**

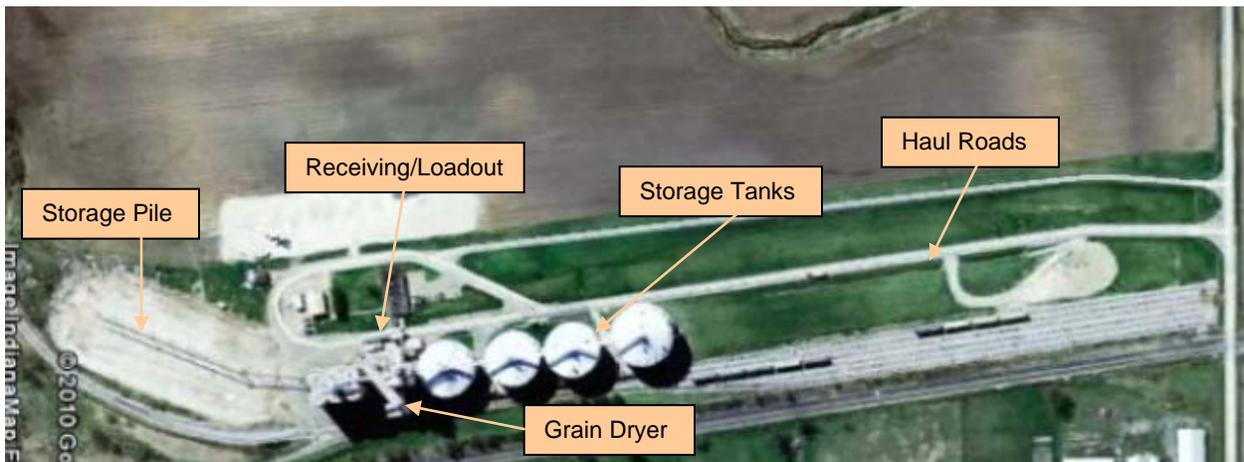
This Plan meets the requirements of 326 IAC 6-5 for the control of fugitive particulate matter emissions from process operations and emission units.

**3.0 SOURCES OF FUGITIVE PARTICULATE**

The following sources of fugitive particulate are found at this Source:

- Grain receiving and loadout operations (EU101 and EU108)
- Storage tank transfer and filling (FS103 and FS104)
- Grain storage piles / Bag filling (EU111)
- Grain drying (EU100)
- Haul roads

**4.0 SOURCE MAP**



## 5.0 HAUL ROADS

The Source receives grain by truck for storage and transport to the adjacent ethanol production facility. Small amounts of grain are shipped from the Source by truck. The haul roads are paved. Employees drive and park on stone surfaces with minimal production of dust.

## 6.0 MATERIAL HANDLED

The Source is an elevator for the receipt, storage, transfer, and/or shipment of grain. The Source handles corn and other similar grains at a maximum of 1,680,000 tons per year (60 million bushels per year).

## 7.0 CONTROL MEASURES

The Source uses soyoil as a dust suppressant and implements proper control measures to reduce fugitive particulate emissions as discussed below:

### **Grain receiving and loadout operations (EU101 and EU108)**

The grain receiving and loadout operations occur within a structure and the exhausts are controlled by a central dust collector. A majority of the grain is received by hopper trucks. Any potential spill over is cleaned to reduce any potential fugitive dust.

### **Storage tank transfer and filling (FS103 and FS104)**

The tank transfer and filling occurs via partially enclosed conveyors with limited potential for significant fugitive dust releases.

### **Grain storage piles / Bag filling (EU111)**

The Source currently fills oversized storage bags instead of having an open aggregate storage pile. Potential fugitive dust is reduced through the use of best management practices by reducing the distance the loading conveyor is from the bags to be filled; reducing the time the grain is affected by ambient air. If the overhead augers are in use for a storage pile, a dust suppressant hopper is used in front of the augers.

### **Grain drying (EU100)**

The grain dryer is a state of the art unit with built in measure to limit fugitive emissions. Performance data has demonstrated full compliance with all applicable regulations.

### **Haul roads**

The haul roads are swept weekly or more frequent if needed to minimize fugitive dust from becoming airborne.

## 8.0 COMPLIANCE SCHEDULE

The Source is currently in full compliance with all measures discussed in this Dust Control Plan.

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

**Attachment B**

**Subpart DD—Standards of Performance for Grain Elevators**

**Source:** 43 FR 34347, Aug. 3, 1978, unless otherwise noted.

**§ 60.300 Applicability and designation of affected facility.**

(a) The provisions of this subpart apply to each affected facility at any grain terminal elevator or any grain storage elevator, except as provided under §60.304(b). The affected facilities are each truck unloading station, truck loading station, barge and ship unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations.

(b) Any facility under paragraph (a) of this section which commences construction, modification, or reconstruction after August 3, 1978, is subject to the requirements of this part.

[43 FR 34347, Aug. 3, 1978, as amended at 52 FR 42434, Nov. 5, 1988]

**§ 60.301 Definitions.**

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.

(a) *Grain* means corn, wheat, sorghum, rice, rye, oats, barley, and soybeans.

(b) *Grain elevator* means any plant or installation at which grain is unloaded, handled, cleaned, dried, stored, or loaded.

(c) *Grain terminal elevator* means any grain elevator which has a permanent storage capacity of more than 88,100 m<sup>3</sup> (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots.

(d) *Permanent storage capacity* means grain storage capacity which is inside a building, bin, or silo.

(e) *Railcar* means railroad hopper car or boxcar.

(f) *Grain storage elevator* means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 35,200 m<sup>3</sup> (ca. 1 million bushels).

(g) *Process emission* means the particulate matter which is collected by a capture system.

(h) *Fugitive emission* means the particulate matter which is not collected by a capture system and is released directly into the atmosphere from an affected facility at a grain elevator.

(i) *Capture system* means the equipment such as sheds, hoods, ducts, fans, dampers, etc. used to collect particulate matter generated by an affected facility at a grain elevator.

(j) *Grain unloading station* means that portion of a grain elevator where the grain is transferred from a truck, railcar, barge, or ship to a receiving hopper.

(k) *Grain loading station* means that portion of a grain elevator where the grain is transferred from the elevator to a truck, railcar, barge, or ship.

(l) *Grain handling operations* include bucket elevators or legs (excluding legs used to unload barges or ships), scale hoppers and surge bins (garners), turn heads, scalpers, cleaners, trippers, and the headhouse and other such structures.

(m) *Column dryer* means any equipment used to reduce the moisture content of grain in which the grain flows from the top to the bottom in one or more continuous packed columns between two perforated metal sheets.

(n) *Rack dryer* means any equipment used to reduce the moisture content of grain in which the grain flows from the top to the bottom in a cascading flow around rows of baffles (racks).

(o) *Unloading leg* means a device which includes a bucket-type elevator which is used to remove grain from a barge or ship.

[43 FR 34347, Aug. 3, 1978, as amended at 65 FR 61759, Oct. 17, 2000]

#### **§ 60.302 Standard for particulate matter.**

(a) On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any gases which exhibit greater than 0 percent opacity from any:

- (1) Column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch).
- (2) Rack dryer in which exhaust gases pass through a screen filter coarser than 50 mesh.

(b) On and after the date on which the performance test required to be conducted by §60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:

- (1) Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf).
- (2) Exhibits greater than 0 percent opacity.

(c) On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from:

- (1) Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.
- (2) Any grain handling operation which exhibits greater than 0 percent opacity.
- (3) Any truck loading station which exhibits greater than 10 percent opacity.
- (4) Any barge or ship loading station which exhibits greater than 20 percent opacity.

(d) The owner or operator of any barge or ship unloading station shall operate as follows:

(1) The unloading leg shall be enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device shall be maintained on both sides of the leg and the grain receiving hopper.

(2) The total rate of air ventilated shall be at least 32.1 actual cubic meters per cubic meter of grain handling capacity (ca. 40 ft<sup>3</sup> /bu).

(3) Rather than meet the requirements of paragraphs (d)(1) and (2) of this section the owner or operator may use other methods of emission control if it is demonstrated to the Administrator's satisfaction that they would reduce emissions of particulate matter to the same level or less.

### **§ 60.303 Test methods and procedures.**

(a) In conducting the performance tests required in §60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b). Acceptable alternative methods and procedures are given in paragraph (c) of this section.

(b) The owner or operator shall determine compliance with the particulate matter standards in §60.302 as follows:

(1) Method 5 shall be used to determine the particulate matter concentration and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 1.70 dscm (60 dscf). The probe and filter holder shall be operated without heaters.

(2) Method 2 shall be used to determine the ventilation volumetric flow rate.

(3) Method 9 and the procedures in §60.11 shall be used to determine opacity.

(c) The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:

(1) For Method 5, Method 17 may be used.

[54 FR 6674, Feb. 14, 1989]

### **§ 60.304 Modifications.**

(a) The factor 6.5 shall be used in place of "annual asset guidelines repair allowance percentage," to determine whether a capital expenditure as defined by §60.2 has been made to an existing facility.

(b) The following physical changes or changes in the method of operation shall not by themselves be considered a modification of any existing facility:

(1) The addition of gravity loadout spouts to existing grain storage or grain transfer bins.

(2) The installation of automatic grain weighing scales.

(3) Replacement of motor and drive units driving existing grain handling equipment.

(4) The installation of permanent storage capacity with no increase in hourly grain handling capacity.

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

**Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit (FESOP) Renewal**

**Source Background and Description**

<b>Source Name:</b>	<b>Cargill AgHorizons - Linden Grain Elevator</b>
<b>Source Location:</b>	<b>173 West County Road 1100 North, Linden, IN 47955</b>
<b>County:</b>	<b>Montgomery</b>
<b>SIC Code:</b>	<b>5153</b>
<b>Permit Renewal No.:</b>	<b>F 107-29227-00009</b>
<b>Permit Reviewer:</b>	<b>Jason R. Krawczyk</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Cargill AgHorizons - Linden Grain Elevator relating to the operation of a stationary grain elevator, where grain means corn, wheat, sorghum, rice, rye, oats, barley, and soybeans. On May 07, 2010, Cargill AgHorizons - Linden Grain Elevator submitted an application to the OAQ requesting to renew its operating permit. Cargill AgHorizons - Linden Grain Elevator was issued its original operating permit F107-29227-00009 on March 1, 2006.

**Source Definition**

The following two (2) companies are located at the same location (173 West, Country Road 1100 North, Linden, Indiana 47955):

- (a) Cargill AgHorizons – Linden Grain Elevator (Plant ID #107-00009), an existing grain elevator (SIC 5153), which started operation in 1972.
- (b) Valero Renewable Fuels Company, LLC - Valero Linden Plant (Plant ID #107-00061), an ethanol production plant (SIC 2869). All the grain received at the ethanol plant will be from Cargill AgHorizons - Linden Grain Elevator.

Since these two (2) plants are located on adjacent property and have a supporting relationship, IDEM, OAQ has determined that these two (2) plants should be considered one (1) source for purposes of determining the potential to emit regulated air pollutants and applicable requirements under the Clean Air Act (as amended by the 1990 Clean Air Act Amendments), Title 40 of the Code of Federal Regulations (CFR), and Title 326 of the Indiana Administrative Code (IAC). Separate FESOPs have been issued to Plant #107-00009 and #107-00061 solely for administrative purposes. This permit covers the Cargill AgHorizons - Linden Grain Elevator plant (#107-00009).

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and control equipment:

- (a) One (1) grain receiving operation, identified as EU101, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:
  - (1) One (1) truck dump pit, with a maximum capacity of 840 tons of grain per hour.
  - (2) One (1) truck/railcar dump pit, with a maximum capacity of 840 tons of grain per hour.

Under NSPS, Subpart DD, the grain receiving operation EU101 is considered a grain loading station.

- (b) One (1) grain leg handling system, identified as EU102, constructed in 1972 and modified in 2007 and 2010, controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of the following:

- (1) Two (2) enclosed transfer legs associated with the grain dump pits, identified as Leg 1 and Leg 2, each with a maximum throughput rate of 840 tons of grain per hour.
- (2) Two (2) enclosed transfer legs associated with the grain dryer, identified as Leg 3 and Leg 4, each with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the grain leg handling system EU102 is considered an affected grain handling operation.

- (c) One (1) enclosed conveyor system, identified as EU103, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of the following:

- (1) Four (4) enclosed conveyors, identified as C1, C2, C7, and C9, each with a maximum throughput rate of 840 tons of grain per hour.
- (2) Five (5) enclosed conveyors which transfers grain to Valero Renewable Fuels Company, LLC - Valero Linden Plant, identified as EC1 through EC5, with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the enclosed conveyor system EU103 is considered an affected grain handling operation.

- (d) One (1) drag conveyor system, identified as EU104, constructed in 1972 modified in 2007 and 2010, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of six (6) enclosed drag conveyors (identified as Dry Drag 1 through Dry Drag 4, Wet Drag 1 and Wet Drag 2), each with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the drag conveyor system EU104 is considered an affected grain handling operation.

- (e) Seven (7) headhouse storage bins and one (1) metal storage tank, identified as EU105, constructed in 1972, with a total storage capacity of 725,625 bushels, and with a total maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.
- (f) Eight (8) annex storage bins, identified as EU106, constructed in 1979, with a total storage capacity of 557,800 bushels and with a total maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the annex storage bins identified as EU106 are considered an affected grain handling operation.

- (g) One (1) natural gas-fired column grain dryer, identified as EU100, constructed in 2010, with a maximum heat input capacity of 108 MMBtu/hr and a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the natural gas-fired column grain dryer is considered an affected facility.

- (h) Three (3) metal storage tanks, identified as FS104, constructed in 1972, with a total storage capacity of 1,850 bushels and a maximum total throughput rate of 560 tons of grain per hour.
- (i) Three (3) storage tank conveyors, identified as FS103, constructed in 1972, each with a maximum throughput rate of 560 tons of grain per hour.
- (j) One (1) grain loadout operation, identified as EU108, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:
  - (1) One (1) railcar loadout operation, with a maximum throughput rate of 1,120 tons of grain per hour.
  - (2) One (1) truck loadout operation, with a maximum throughput rate of 840 tons of grain per hour.

Under NSPS, Subpart DD, the grain loadout operation EU108 is considered an affected grain unloading station.

- (k) One (1) tank reclaim conveyor, identified as C5, constructed in 1972 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.

Under NSPS, Subpart DD, the reclaim conveyor C5 is considered an affected grain handling operation.

- (l) One (1) annex bin reclaim conveyor, identified as C8, constructed in 1979 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the reclaim conveyor C8 is considered an affected grain handling operation.

- (m) One (1) enclosed headhouse distributor, identified as EU113, constructed in 1972 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the headhouse distributor EU113 is considered an affected grain handling operation.

- (n) One (1) enclosed annex distributor, identified as EU114, constructed in 1979 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the annex distributor EU114 is considered an affected grain handling operation.

<b>Unpermitted Emission Units and Pollution Control Equipment</b>
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There are no unpermitted emission units operating at the source at the time of this permit review.

### **Emission Units and Pollution Control Equipment Removed From the Source**

There have been no emission units removed from the source since the last permit approval.

### **Insignificant Activities**

The source also consists of the following insignificant activities:

- (a) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (c) Paved roads and parking lots with public access.
- (d) Other emission units, not regulated by a NESHAP, with PM<sub>10</sub>, NO<sub>x</sub>, and SO<sub>2</sub> emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) tons per year of any combination of HAPs:

Three (3) outdoor grain storage piles, identified as EU111, with a total maximum throughput rate of 1,680,000 tons/yr.

### **Existing Approvals**

Since the issuance of FESOP 107-21971-00009 on March 1, 2006, the Cargill AgHorizons - Linden Grain Elevator part of the source has constructed or has been operating under the following additional approvals:

- (a) First Significant Permit Revision No. 107-22880-00009, issued on October 6, 2006;
- (b) Second Significant Permit Revision No. 107-23999-00009, issued on May 21, 2007;
- (c) Third Significant Permit Revision No. 107-26081-00009, issued on May 13, 2008; and
- (d) First Administrative Amendment No. 107-26982-00009, issued on October 28, 2008.
- (e) Fourth Significant Permit Revision No. 107-29048-00009, issued on June 18, 2010.

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.

### **Enforcement Issue**

There are no enforcement actions pending.

**County Attainment Status**

The source is located in Montgomery County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Montgomery 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

Montgomery County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants

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

**Fugitive Emissions**

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, however, there is an applicable New Source Performance Standard that was in effect on August 7, 1980, therefore fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The effective date of NSPS, Subpart DD was August 3, 1978.

Note: The above-mentioned fugitive emissions evaluation is limited only to the grain elevator portion of the source. A separate and different fugitive emissions evaluation is determined for the ethanol production plant.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Unrestricted Potential Emissions**

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

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

Table 1	
Pollutant	Potential To Emit (tons/year)
PM	Greater than 250
PM10 <sup>(1)</sup>	Greater than 250
PM2.5	Greater than 250
SO <sub>2</sub>	Less than 25
NO <sub>x</sub>	Less than 100
VOC	Less than 25
CO	Less than 100

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

Table 2	
HAPs	Potential To Emit (tons/year)
Single HAP	Less than 10
Combined HAPs	Less than 25

Note: Table 1 and Table 2 show the potential emissions of the grain elevator only.

Table 3	
Pollutant	Potential To Emit (tons/year)
PM	Greater than 250
PM <sub>10</sub>	Greater than 250
PM <sub>2.5</sub>	Greater than 250
SO <sub>2</sub>	Less than 25
VOC	Greater than 250
CO	Greater than 250
NO <sub>x</sub>	Greater than 250

Table 4	
HAPs	Potential To Emit (tons/year)
Single	Greater than 10
Combined	Greater than 25

Note: Table 3 and Table 4 show the unrestricted potential emissions of the ethanol production plant and grain elevator.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 and PM2.5 is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM10 and PM2.5 emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) 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 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.

<b>Potential to Emit After Issuance</b>
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The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.



Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the Renewal (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP <sup>(c)</sup>
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									
(a) The effective date of NSPS, Subpart DD was August 3, 1978, therefore fugitive emissions from Cargill AgHorizons - Linden Grain Elevator are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability. Thus the Total PTE of Cargill AgHorizons Linden Grain Elevator is equal to the fugitive and non-fugitive emissions.									
(b) Fugitive PM, PM10, PM2.5, and VOC emissions are not counted toward the determination of PSD and Emission Offset applicability for the Valero Renewable Fuels Company, LLC - Valero Linden Plant, since this source 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 are no applicable New Source Performance Standard that were in effect on August 7, 1980. Thus the Total PTE of Valero Renewable Fuels Company, LLC - Valero Linden Plant is equal to the non-fugitive emissions only.									
(c) Worst Single HAP is Acetaldehyde.									
(d) This limited PTE is the total emissions with or without the use of the baghouse.									
Valero Renewable Fuels Company, LLC - Valero Linden Plant is capable of producing both DDGS and WDGS. The emissions from the DDGS production are considered the worst case. Therefore, the PTE of the wet cake production is not included in the PTE for the entire source.									

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), not applicable, the source shall comply with the following for the Cargill AgHorizons - Linden Grain Elevator plant:

- (1) The PM10 and PM2.5 emissions from the grain receiving (EU101), handling (EU102 - EU106, C8, C5, EU113, and EU114), and loadout (EU108) operations shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	Control Device	PM10 Emission Limit (lbs/hr) Utilizing Baghouse	PM2.5 Emission Limit (lbs/hr) Utilizing Baghouse	PM10 Emission Limit (lbs/hr) No Baghouse	PM2.5 Emission Limit (lbs/hr) No Baghouse
EU101	Grain Receiving	Baghouse BH1	0.58  (this is equivalent to 2.55 tons/yr)	0.58  (this is equivalent to 2.55 tons/yr)	58.29	58.29
EU102 EU103 EU104 C8 EU113 EU114	Grain Handling					
EU105 EU106	Grain Storage					
EU108	Grain Loadout					
C5	Tank Reclaim Conveyor	Baghouse BH2	0.43  (this is equivalent to 1.88 tons/yr)	0.43  (this is equivalent to 1.88 tons/yr)	N/A*	N/A*

Note: \* Tank Reclaim Conveyor C5 is fully enclosed and located underground. When Baghouse BH2 is not in operation, there are no emission point exhausts from this unit.

- (2) The combined PM10 and PM2.5 emissions from emission units EU101 through EU106, EU108, C8, EU113, and EU114 shall be less than 2.55 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Note: The Grain Receiving, Grain Handling, Grain Storage, and Grain Loadout operations may operate while utilizing Baghouse BH1 or without the use of the baghouse. At no time shall the combined emissions for these operations exceed 2.55 tons per year. To ensure compliance with this limit, the source shall determine emissions according to the formula identified below.

The Permittee shall determine particulate emissions from emission units EU101 through EU106, EU108, C8, EU113, and EU114, according to the following formula:

$$E = \frac{U(PT_U) + C(PT_C)}{2,000 \text{ lbs/ton}}$$

where:

- E = Tons of particulate emissions for a 12-month consecutive period
- U = Uncontrolled Emission Rate (0.036 lb/ton) or the emission factor determined from the most recent valid stack test
- C = Controlled Emission Rate (0.000364 lb/ton) or the emission factor determined from the most recent valid stack test
- PT<sub>U</sub> = Production Throughput (tons) while Baghouse BH1 is not operated
- PT<sub>C</sub> = Production Throughput (tons) while Baghouse BH1 is operated

- (3) The Permittee shall comply with the following throughput rate limits:

Unit ID	Unit Description	Throughput Limits (tons of grain per twelve (12) consecutive month period)
FS104	Grain Storage Tanks	700,000
FS103	Storage Tank Conveyors	700,000
EU100	Grain Dryer	420,000

In conjunction with the above mentioned limits, the Permittee shall comply with the following emission limitations for PM10 and PM2.5 emissions:

Unit ID	Unit Description	PM10 Emission Limit (lbs/ton)	PM2.5 Emission Limit (lbs/ton)
FS104	Grain Storage Tanks	0.0063	0.0063
FS103	Storage Tank Conveyors	0.0340	0.0340
EU100	Grain Dryer	0.0550	0.0550

- (4) The amount of natural gas combusted in the grain dryer (EU100) shall not exceed 80 million cubic feet (MMCF) per twelve (12) consecutive month period with compliance determined at the end of each month.

NOx emissions from the grain dryer (EU100) shall not exceed 100 pounds per million cubic foot (lbs/MMCF). At this rate and the above mentioned natural gas limit, the NOx emissions are equivalent to 4 tons/year.

CO emissions from the grain dryer (EU100) shall not exceed 84 pounds per million cubic foot (lbs/MMCF). At this rate and the above mentioned natural gas limit, the CO emissions are equivalent to 3.36 tons/year.

Compliance with these limits, combined with the potential to emit PM10, PM2.5, NOx, and CO from all other emission units and the potential to emit PM10, PM2.5, NOx and CO from Valero Renewable Fuels Company, LLC - Valero Linden Plant (Plant ID #107-00061), shall limit the source-wide total potential to emit PM10, PM2.5, NOx, and CO to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

Note: The throughput limits for Grain Receiving and Grain Loadout have been removed. There have been no additional changes to existing FESOP limits during this Renewal review.

(b) PSD Minor Source

In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the source shall comply with the following for Cargill AgHorizons (Plant #107-00009):

- (1) The PM emissions from the grain receiving (EU101), handling (EU102 - EU106, C8, C5, EU113, and EU114), and loadout (EU108) operations shall not exceed the emission limits listed in the table below:

Unit ID	Unit Description	Control Device	PM Emission Limit (lbs/hr) Utilizing Baghouse	PM Emission Limit (lbs/hr) No Baghouse
EU101	Grain Receiving	Baghouse BH1	0.58 (this is equivalent to 2.55 tons/yr)	58.29
EU102 EU103 EU104 C8 EU113 EU114	Grain Handling			
EU105 EU106	Grain Storage			
EU108	Grain Loadout			
C5	Tank Reclaim Conveyor			

Note: \* Tank Reclaim Conveyor C5 is fully enclosed and located underground. When Baghouse BH2 is not in operation, there are no emission point exhausts from this unit.

- (2) The combined PM emissions from emission units EU101 through EU108, C8, EU113, and EU114 shall be less than 2.55 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Note: The Grain Receiving, Grain Handling, Grain Storage, and Grain Loadout operations may operate while utilizing Baghouse BH1 or without the use of the baghouse. At no time shall the combined emissions for these operations exceed 2.55 tons per year. To ensure compliance with this limit, the source shall determine emissions according to the formula identified below.

The Permittee shall determine particulate emissions from emission units EU101 through EU108, C8, EU113, and EU114, according to the following formula:

$$E = \frac{U(PT_U) + C(PT_C)}{2,000 \text{ lbs/ton}}$$

where:

- E = Tons of particulate emissions for a 12-month consecutive period
- U = Uncontrolled Emission Rate (0.036 lb/ton) or the emission factor determined from the most recent valid stack test
- C = Controlled Emission Rate (0.000364 lb/ton) or the emission factor determined from the most recent valid stack test
- PT<sub>U</sub> = Production Throughput (tons) while Baghouse BH1 is not operated
- PT<sub>C</sub> = Production Throughput (tons) while Baghouse BH1 is operated

(3) The Permittee shall comply with the following throughput rate limits:

Unit ID	Unit Description	Throughput Limits (tons of grain per twelve (12) consecutive month period)
FS104	Grain Storage Tanks	700,000
FS103	Storage Tank Conveyors	700,000
EU100	Grain Dryer	420,000

In conjunction with the above mentioned limits, the Permittee shall comply with the following emission limitations for PM emissions:

Unit ID	Unit Description	PM Emission Limit (lbs/ton)
FS104	Grain Storage Tanks	0.025
FS103	Storage Tank Conveyors	0.061
EU100	Grain Dryer	0.22

Compliance with these limits, combined with the potential to emit PM from all other emission units of this source (Plant ID #107-000009) and the potential to emit PM from Valero Renewable Fuels Company, LLC - Valero Linden Plant (Plant ID #107-00061), shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.

Note: The throughput limits for Grain Receiving and Grain Loadout have been removed. There have been no additional changes to existing FESOP limits during this Renewal review.

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

(a) The source is subject to the New Source Performance Standards for Grain Elevators (40 CFR 60, Subpart DD), because is has constructed, reconstructed, and modified emission units after August 3, 1978, that were considered part of an existing grain handling operation.

The units subject to this rule include the following:

- (1) One (1) grain receiving operation, identified as EU101, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:
  - (A) One (1) truck dump pit, with a maximum capacity of 840 tons of grain per hour.
  - (B) One (1) truck/railcar dump pit, with a maximum capacity of 840 tons of grain per hour.

Under NSPS, Subpart DD, the grain receiving operation EU101 is considered a grain loading station.

- (2) One (1) grain leg handling system, identified as EU102, constructed in 1972 and modified in 2007 and 2010, controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of the following:
- (A) Two (2) enclosed transfer legs associated with the grain dump pits, identified as Leg 1 and Leg 2, each with a maximum throughput rate of 840 tons of grain per hour.
  - (B) Two (2) enclosed transfer legs associated with the grain dryer, identified as Leg 3 and Leg 4, each with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the grain leg handling system EU102 is considered an affected grain handling operation.

- (3) One (1) enclosed conveyor system, identified as EU103, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of the following:
- (A) Four (4) enclosed conveyors, identified as C1, C2, C7, and C9, each with a maximum throughput rate of 840 tons of grain per hour.
  - (B) Five (5) enclosed conveyors which transfers grain to Valero Renewable Fuels Company, LLC - Valero Linden Plant, identified as EC1 through EC5, with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the enclosed conveyor system EU103 is considered an affected grain handling operation.

- (4) One (1) drag conveyor system, identified as EU104, constructed in 1972 and modified in 2007 and 2010, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110, and consisting of six (6) enclosed drag conveyors (identified as Dry Drag 1 through Dry Drag 4, Wet Drag 1 and Wet Drag 2), each with a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the drag conveyor system EU104 is considered an affected grain handling operation.

- (5) Eight (8) annex storage bins, identified as EU106, constructed in 1979, with a total storage capacity of 557,800 bushels and with a total maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the annex storage bins identified as EU106 are considered an affected grain handling operation.

- (6) One (1) natural gas-fired column grain dryer, identified as EU100, constructed in 2010, with a maximum heat input capacity of 108 MMBtu/hr and a maximum throughput rate of 420 tons of grain per hour.

Under NSPS, Subpart DD, the natural gas-fired column grain dryer is considered an affected facility.

- (7) One (1) grain loadout operation, identified as EU108, constructed in 1972 and modified in 2007, controlled by baghouse BH1, with emissions exhausted through Stack EP110, consisting of the following:

- (A) One (1) railcar loadout operation, with a maximum throughput rate of 1,120 tons of grain per hour.
- (B) One (1) truck loadout operation, with a maximum throughput rate of 840 tons of grain per hour.

Under NSPS, Subpart DD, the grain loadout operation EU108 is considered an affected grain unloading station.

- (9) One (1) tank reclaim conveyor, identified as C5, constructed in 1972 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH2, with emissions exhausted through Stack EP120.

Under NSPS, Subpart DD, the reclaim conveyor C5 is considered an affected grain handling operation.

- (10) One (1) annex bin reclaim conveyor, identified as C8, constructed in 1979 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the reclaim conveyor C8 is considered an affected grain handling operation

- (11) One (1) enclosed headhouse distributor, identified as EU113, constructed in 1972 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the headhouse distributor EU113 is considered an affected grain handling operation.

- (12) One (1) enclosed annex distributor, identified as EU114, constructed in 1979 and modified in 2007, with a maximum throughput rate of 840 tons of grain per hour, indirectly controlled by baghouse BH1, with emissions exhausted through Stack EP110.

Under NSPS, Subpart DD, the annex distributor EU114 is considered an affected grain handling operation.

Applicable portions of the NSPS are the following:

- (1) 40 CFR 60.300
- (2) 40 CFR 60.301
- (3) 40 CFR 60.302(a)(1)
- (4) 40 CFR 60.303
- (5) 40 CFR 60.304

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to EU100 except as otherwise specified in 40 CFR 60, Subpart DD.

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

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

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

### Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)  
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The unlimited potential to emit of HAPs from the source is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall continue to limit the potential to emit of HAPs to 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. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 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.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
Pursuant to 326 IAC 6-5, the source shall continue to control fugitive particulate matter emissions according to their Fugitive Dust Control Plan, included as Attachment A to the permit.

Grain Receiving, Handling, and Loadout Operations

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of following operations shall not exceed the pound per hour limits listed in the table below:

Unit ID	Unit Description	Maximum Throughput Rate (tons/hr)	Control Device	326 IAC 6-3-2 Total Allowable Particulate Emission Rate (lbs/hr)
EU101	Dump Pit 1	840	Baghouse BH1	75.35
	Dump Pit 2	840		75.35
EU102	Grain Leg 1	840		75.35
	Grain Leg 2	840		75.35
	Grain Leg 3	420		66.89
	Grain Leg 4	420		66.89
EU103	Enclosed Conveyor C1	840		75.35
	Enclosed Conveyor C2	840		75.35
	Enclosed Conveyor C7	840		75.35
	Enclosed Conveyor C9	840		75.35
	Enclosed Conveyors EC1-EC5	420		66.89 (each)
EU104	Dry Drag 1	420		66.89
	Dry Drag 2	420		66.89
	Dry Drag 3	420		66.89
	Dry Drag 4	420		66.89
	Wet Drag 1	420		66.89
	Wet Drag 2	420		66.89
EU105	Headhouse Storage Bins 1-7 and one (1) metal storage tank	840		75.35 (each)
EU106	Annex Storage Bins 8-15	840		75.35 (each)
EU108	Railcar Grain Loadout Station	1,120		79.06
	Truck Grain Loadout Station	840	75.35	
C8	Annex Bin Reclaim Conveyor	840	75.35	
EU113	Headhouse Distributor	840	75.35	
EU114	Annex Distributor	840	75.35	
C5	Tank Reclaim Conveyor	840	Baghouse BH2	75.35
EU100	Grain Dryer	420	None	66.89
FS104	Each Metal Storage Tank	560	None	70.32 (each)
FS103	Each Storage Tank Conveyor	560	None	70.32 (each)

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

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

Based on calculations, no control devices are necessary to comply with these limits.

Note: The pound per hour limits have been revised to coincide with the particulate matter emissions limits requirements as contained in 326 IAC 6-3-2

- (i) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.

**Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Stack ID / Control ID	Parameter	Frequency	Range	Excursions and Exceedances
EP110 / BH1	Visible Emissions	Daily	Normal - Abnormal	Response Steps
	Pressure Drop	Daily	1.0 - 6.0 Inches	
EP120 / BH2	Visible Emissions	Daily	Normal - Abnormal	
	Pressure Drop	Daily	1.0 - 6.0 Inches	

- (b) The testing requirements applicable to this source are as follows:

Stack ID / Control ID	Timeframe for Testing	Pollutant(s)	Frequency of Testing
EP110 / BH1	Within five (5) years from the date of the most recent valid compliance demonstration	PM	Once every five (5) years
	Not later than five (5) years from the date of the last valid compliance demonstration, or within 180 days after publication of revised test method, whichever is later	PM10, PM2.5	
EP120 / BH2	Within five (5) years from the date of the most recent valid compliance demonstration	PM	
	Not later than five (5) years from the date of the last valid compliance demonstration, or within 180 days after publication of revised test method, whichever is later	PM10, PM2.5	

**Note:** The last valid stack tests were performed on December 18/19, 2007.

**Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 7, 2010.

The continued operation of this stationary grain elevator shall be subject to the conditions of the attached proposed FESOP Renewal No. 107-29227-00009. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**Appendix A: Emissions Calculations  
Emission Summary**

**Company Name: Cargill AgHorizons - Linden Grain Elevator**  
**Address: 173 West County Road 1100 North, Linden, IN 47955**  
**Permit No.: F107-29227-00009**  
**Source ID: 107-00009**  
**Reviewer: Jason R. Krawczyk**  
**Date: November 5, 2010**

Process, Emission Units, Stack	Control Device	Potential to Emit Before Control								
		PM	PM10	PM2.5	VOC	NOx	SO2	CO	Single HAP	Combined HAPs
<b>Cargill AgHorizons - Linden Grain Elevator</b>										
Emission Units										
Grain Receiving, Handling, Storage , and Loadout (EU101 - EU106, EU108, C8, EU113, EU114) (EP110)	Baghouse BH-1	255.29	255.29	255.29	-	-	-	-	-	-
Tank Reclaim Conveyor (C5) (EP120)	Baghouse BH-2	187.71	187.71	187.71	-	-	-	-	-	-
Grain Dryer (EU100)	N/A	404.71	101.18	17.29	-	-	-	-	-	-
Grain Dryer Combustion (EU100)	N/A	0.88	3.52	3.52	2.55	88.12	0.28	38.96	-	0.88
Fugitive Emissions										
Grain Receiving and Loadout	N/A	101.64	30.91	5.21	-	-	-	-	-	-
Tanks and Conveyors	N/A	153.58	76.52	13.08	-	-	-	-	-	-
Grain Storage Piles (EU111)	N/A	1.36	0.64	0.10	-	-	-	-	-	-
Paved Roads	N/A	59.99	11.69	1.74	-	-	-	-	-	-
Total Fugitive:	-	316.57	119.76	20.13	0.00	0.00	0.00	0.00	0.00	0.00
Total (non-Fugitive):	-	848.60	547.71	463.82	2.55	88.12	0.28	38.96	0.00	0.88
<b>Total (Fugitive + non-Fugitive)*:</b>	<b>-</b>	<b>1165.17</b>	<b>667.47</b>	<b>483.95</b>	<b>2.55</b>	<b>88.12</b>	<b>0.28</b>	<b>38.96</b>	<b>0.00</b>	<b>0.88</b>

**Notes:**

\*Fugitive emissions for Cargill AgHorizons - Linden Grain Elevator are counted toward the determination of Part 70, PSD, and Emission Offset applicability because the New Source Performance Standard Subpart DD was in effect on August 7, 1980.

**Appendix A: Emission Calculations  
Emissions Summary (continued)**

Process, Emission Units, Stack	Control Device	Potential to Emit After Control (ton/yr)								
		PM	PM10	PM2.5	VOC	NOx	SO2	CO	Single HAP	Combined HAPs
<b>Cargill AgHorizons - Linden Grain Elevator</b>										
Emission Units										
Grain Receiving, Handling, Storage, and Loadout (EU101 - EU106, EU108, C8, EU113, EU114) (EP110)	Baghouse BH-1	2.55	2.55	2.55	-	-	-	-	-	-
Tank Reclaim Conveyor (C5) (EP120)	Baghouse BH-2	1.88	1.88	1.88	-	-	-	-	-	-
Grain Dryer (EU100)	N/A	404.71	101.18	17.29	-	-	-	-	-	-
Grain Dryer Combustion (EU100)	N/A	0.88	3.52	3.52	2.55	88.12	0.28	38.96	-	0.88
Fugitive Emissions										
Grain Receiving and Loadout	N/A	10.16	3.09	0.52	-	-	-	-	-	-
Tanks and Conveyors	N/A	30.10	14.11	2.42	-	-	-	-	-	-
Grain Storage Piles (EU111)	N/A	1.36	0.64	0.10	-	-	-	-	-	-
Paved Roads	N/A	29.99	5.84	0.87	-	-	-	-	-	-
Total Fugitive:	-	71.62	23.68	3.90	0.00	0.00	0.00	0.00	0.00	0.00
Total (non-Fugitive):	-	410.02	109.13	25.25	2.55	88.12	0.28	38.96	0.00	0.88
<b>Total (Fugitive + non-Fugitive)*:</b>	<b>-</b>	<b>481.64</b>	<b>132.81</b>	<b>29.15</b>	<b>2.55</b>	<b>88.12</b>	<b>0.28</b>	<b>38.96</b>	<b>0.00</b>	<b>0.88</b>

**Notes:**

\*Fugitive emissions for Cargill AgHorizons - Linden Grain Elevator are counted toward the determination of Part 70, PSD, and Emission Offset applicability because the New Source Performance Standard Subpart DD was in effect on August 7, 1980.

**Appendix A: Emission Calculations  
Emissions Summary (continued)**

Process, Emission Units, Stack	Control Device	Limited Potential to Emit (ton/yr)								
		PM	PM10	PM2.5	VOC	NOx	SO2	CO	Single HAP	Combined HAPs
<b>Cargill AgHorizons - Linden Grain Elevator</b>										
Emission Units										
Grain Receiving, Handling, Storage, and Loadout (EU101 - EU106, EU108, C8, EU113, EU114) (EP110)	Baghouse BH-1	2.55	2.55	2.55	-	-	-	-	-	-
Tank Reclaim Conveyor (C5) (EP120)	Baghouse BH-2	1.88	1.88	1.88	-	-	-	-	-	-
Grain Dryer (EU100)	N/A	46.20	11.55	11.55	-	-	-	-	-	-
Grain Dryer Combustion (EU100)	N/A	0.08	0.30	0.30	0.22	4.00	0.02	3.36	-	0.08
Fugitive Emissions										
Grain Receiving and Loadout	N/A	10.16	3.09	0.52	-	-	-	-	-	-
Tanks and Conveyors	N/A	30.10	14.11	2.42	-	-	-	-	-	-
Grain Storage Piles (EU111)	N/A	1.36	0.64	0.10	-	-	-	-	-	-
Paved Roads	N/A	29.99	5.84	0.87	-	-	-	-	-	-
Total Fugitive:	-	71.62	23.68	3.90	0.00	0.00	0.00	0.00	0.00	0.00
Total (non-Fugitive):	-	50.71	16.29	16.29	0.22	4.00	0.02	3.36	0.00	0.08
<b>Total (Fugitive + non-Fugitive)*:</b>	<b>-</b>	<b>122.33</b>	<b>39.97</b>	<b>20.19</b>	<b>0.22</b>	<b>4.00</b>	<b>0.02</b>	<b>3.36</b>	<b>0.00</b>	<b>0.08</b>

**Notes:**

\*Fugitive emissions for Cargill AgHorizons - Linden Grain Elevator are counted toward the determination of Part 70, PSD, and Emission Offset applicability because the New Source Performance Standard Subpart DD was in effect on August 7, 1980.

**Appendix A: Emission Calculations  
PM and PM10 Emissions  
From the Grain Receiving, Handling, and Loadout Operations**

Company Name: Cargill AgHorizons - Linden Grain Elevator  
Address: 173 West County Road 1100 North, Linden, IN 47955  
Permit No.: F107-29227-00009  
Source ID: 107-00009  
Reviewer: Jason R. Krawczyk  
Date: November 5, 2010

**1. Potential to Emit PM/PM10/PM2.5 - Controlled Emissions:**

Unit IDs	Process Description	Control Device	Outlet Grain Loading (gr/dscf)	Maximum Air Flow Rate (scfm)	Control Efficiency (%)	PTE of PM/PM10/PM2.5 before Control (tons/yr) *	PTE of PM/PM10/PM2.5 after Control (lbs/hr) *	PTE of PM/PM10/PM2.5 after Control (tons/yr) *
EU101 EU102 EU103 EU104 EU105 EU106 EU108 C8 EU113 EU114	Grain Receiving, Handling, Storage, Loadout	Baghouse BH1	0.002	34,000	99%	255.29	0.58	2.55
C5	Tank Reclaim Conveyor	Baghouse BH2	0.002	25,000	99%	187.71	0.43	1.88
<b>Totals</b>						<b>443.01</b>		<b>4.43</b>

\* Assumed PM = PM10 = PM2.5

**Methodology**

PTE of PM/PM10 after Control (lbs/hr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr  
PTE of PM/PM10 after Control (tons/yr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr x 8760 hr/yr x 1 ton/2000 lbs  
PTE of PM/PM10 before Control (tons/yr) = PTE of PM/PM10 after Control (tons/yr) / (100-Control Efficiency)

**2. Potential to Emit PM/PM10 /PM2.5 - Fugitive Emissions:**

Unit ID	Unit Description	Annual Throughput Limit (tons/yr)	Uncontrolled PM Emission Factor (lbs/ton)	Uncontrolled PM10 Emission Factor (lbs/ton)	Uncontrolled PM2.5 Emission Factor (lbs/ton)	Uncontrolled PTE of PM (tons/yr)	Uncontrolled PTE of PM10 (tons/yr)	Uncontrolled PTE of PM2.5 (tons/yr)	Baghouse ID	Control Efficiency (%)	Fugitive PM (tons/yr)	Fugitive PM10 (tons/yr)	Fugitive PM2.5 (tons/yr)
EU101	Grain Receiving (FS100)	1,680,000	0.035	0.0078	0.0013	29.4	6.55	1.09	BH1	90%	2.94	0.66	0.11
EU108	Grain Loadout (FS101)	1,680,000	0.086	0.0290	0.0049	72.2	24.36	4.12	BH1	90%	7.22	2.44	0.41
<b>Totals, Grain Receiving and Loadout</b>						<b>101.6</b>	<b>30.91</b>	<b>5.21</b>			<b>10.16</b>	<b>3.09</b>	<b>0.52</b>
EU102-EU104	Grain Handling	1,680,000	0.061	0.0340	0.0058	51.2	28.6	4.9	BH1	100%	0.00	0.00	0.00
EU105, EU106	Grain Storage	1,680,000	0.025	0.0063	0.0011	21.0	5.29	0.9	BH1	100%	0.00	0.00	0.00
FS104	Grain Storage Tanks-Grain	700,000	0.025	0.0063	0.0011	8.75	2.21	0.4	None	0%	8.75	2.21	0.39
FS103	Storage Tank Conveyors -Grain	700,000	0.061	0.0340	0.0058	21.35	11.90	2.0	None	0%	21.35	11.90	2.03
C5	Tank Reclaim Conveyor (Grain)	1,680,000	0.061	0.0340	0.0058	51.24	28.56	4.9	BH2	100%	0.00	0.00	0.00
<b>Totals, Tanks and Conveyors</b>						<b>153.58</b>	<b>76.52</b>	<b>13.08</b>			<b>30.10</b>	<b>14.11</b>	<b>2.42</b>

Note: Emission factors are from AP-42, Chapter 9.9.1-1 (04/03), hopper truck (SCC: 3-02-005-52). Assume all the grain is received and loadout by trucks, which is the worst case scenario.

**Methodology**

PTE of Fugitive PM/PM10/PM2.5 (tons/yr) = Annual Throughput Limit (tons/yr) x Uncontrolled Emission Factor (lbs/ton) x (1-Control Efficiency%) x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
PM and PM10 Emissions  
From the Grain Dryer EU100**

**Company Name: Cargill AgHorizons - Linden Grain Elevator  
Address: 173 West County Road 1100 North, Linden, IN 47955  
Permit No.: F107-29227-00009  
Source ID: 107-00009  
Reviewer: Jason R. Krawczyk  
Date: November 5, 2010**

**1. Unlimited PTE**

Unit Description	Maximum Throughput Rate (tons/hr)*	Uncontrolled PM Emission Factor** (lbs/ton)	Uncontrolled PTE of PM (lbs/hr)	Uncontrolled PTE of PM (tons/yr)	Uncontrolled PM10 Emission Factor** (lbs/ton)	Uncontrolled PTE of PM10 (lbs/hr)	Uncontrolled PTE of PM10 (tons/yr)	Uncontrolled PM2.5 Emission Factor** (lbs/ton)	Uncontrolled PTE of PM2.5 (lbs/hr)	Uncontrolled PTE of PM2.5 (tons/yr)
Grain Dryer	420	0.220	92.40	<b>404.71</b>	0.0550	23.10	<b>101.18</b>	0.0094	3.95	<b>17.29</b>

\* The Grain Dryer (EU100) is designed to operate at 280 tons/hr, but at times when the grain's moisture content is lower, the dryer can accommodate up to 420 tons/hr.

\*\* Emission factors are from AP-42, Chapter 9.9.1 - Grain Elevators, Table 9.9.1-1 (04/03), SCC:3-02-005-27

**Methodology**

PTE of PM/PM10 before Control (lbs/hr) = Max. Throughput Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton)

PTE of PM/PM10 before Control (tons/yr) = Max. Throughput Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hr/yr x 1 ton/2000 lbs

**2. Limited PTE**

Annual Throughput Limit:  tons/yr of grain

Unit Description	Throughput (tons/yr)	Uncontrolled PM Emission Factor* (lbs/ton)	Uncontrolled PM10 Emission Factor* (lbs/ton)	Uncontrolled PM2.5 Emission Factor* (lbs/ton)	Control Efficiency (%)	Limited PTE of PM (tons/yr)	Limited PTE of PM10 (tons/yr)	Limited PTE of PM2.5 (tons/yr)
Grain Dryer	420,000	0.220	0.0550	0.0094	0%	46.20	11.55	1.97
<b>Total</b>	<b>420,000</b>					<b>46.20</b>	<b>11.55</b>	<b>1.97</b>

\* Emission factors are from AP-42, Chapter 9.9.1 - Grain Elevators, Table 9.9.1-1 (04/03).

**Methodology**

PTE of Fugitive PM/PM10 (tons/yr) = Annual Throughput Limit (tons/yr) x Uncontrolled Emission Factor (lbs/ton) x (1-Control Efficiency%) x 1 ton/2000 lbs

**Appendix A:Emission Calculations  
Potential PM and PM10 Emissions  
From the Grain Storage Pile EU111**

**Company Name: Cargill AgHorizons - Linden Grain Elevator  
Address: 173 West County Road 1100 North, Linden, IN 47955  
Permit No.: F107-29227-00009  
Source ID: 107-00009  
Reviewer: Jason R. Krawczyk  
Date: November 5, 2010**

**1. Emission Factors:**

According to AP42, Chapter 13.2.4 - Aggregate Handling and Storage Piles (AP-42, 01/95), the PM/PM10 emission factors for aggregate handling process can be estimated from the following equation:

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

where:

E<sub>f</sub> = Emission Factor (lbs/ton)

k = Particle size multiplier =

k = Particle size multiplier =

U = Mean wind speed (mph) =

M = Material Moisture content (%) =

0.74	for PM
0.35	for PM10
0.053	for PM2.5
10	mph (provided by the source)
5	% (provided by the source)

Therefore,

PM Emission Factor =	0.0016	lbs/ton of grain
PM10 Emission Factor =	0.0008	lbs/ton of grain
PM2.5 Emission Factor =	0.0001	lbs/ton of grain

**Potential to Emit PM/PM10/PM2.5:**

\*Max. Throughput Rate: 1,680,000 tons/yr

**Methodology**

PTE of PM (tons/yr) = 67,200 ton/yr x 0.0016 lbs/ton x 1 tons/2000 lbs =	<b>1.36 tons/yr</b>
PTE of PM10 (tons/yr) = 67,200 ton/yr x 0.0008 lbs/ton x 1 tons/2000 lbs =	<b>0.64 tons/yr</b>
PTE of PM2.5 (tons/yr) = 67,200 ton/yr x 0.0001 lbs/ton x 1 tons/2000 lbs =	<b>0.10 tons/yr</b>

\*Assumes all grain received is stored at the grain piles as a worst case scenario; the majority of grain received will be stored within permanent storage silos and tanks.

**Appendix A: Emission Calculations  
Fugitive Emissions From Paved Roads**

Company Name: Cargill AgHorizons - Linden Grain Elevator  
Address: 173 West County Road 1100 North, Linden, IN 47955  
FESOP: F107-29227-00009  
Plt ID: 107-00009  
Reviewer: Jason R. Krawczyk  
Date: November 5, 2010

$$E = [(k \times (sL/2)^{0.65}) \times (W/3)^{1.5} - C](1 - (P/4N))$$

AP-42, Section 13.2.2-1

Factor	Description	Source	Summer Months			Winter Months		
			PM Value	PM <sub>10</sub> Value	PM <sub>2.5</sub> Value	PM Value	PM <sub>10</sub> Value	PM <sub>2.5</sub> Value
E =	Emission factor (lb/VMT, vehicle miles traveled)	Calculation, above	0.83	0.16	0.02	2.04	0.40	0.06
k =	PM Particle size multiplier (lb/VMT)	AP-42, Section 13.2.1	0.082	0.016	0.0024	0.082	0.016	0.0024
sL =	Road surface silt loading (g/m <sup>2</sup> )	AP-42, Section 13.2.1-2	0.60	0.60	0.60	2.40	2.40	2.40
C =	Vehicle exhaust emission factor		0.0005	0.0005	0.0004	0.0005	0.0005	0.0004
P =	Number of "wet" days in an averaging period		120	120	120	120	120	120
N =	Number of days in the averaging period		365	365	365	365	365	365
W =	Average vehicle weight (ton)		25.0	25.0	25.0	25.0	25.0	25.0

**Average Annual Emission Factors**

	Non-Winter Months	Winter Months	Average Factor
PM	9	3	1.13
PM <sub>10</sub>	9	3	0.22
PM <sub>2.5</sub>	9	3	0.03

**PM Emissions from Paved Roads**

Activity	Average Vehicle Weight (tons)	No. of Trucks (truck/yr)	Miles Traveled per Truck (miles/truck)	Annual Mileage (VMT/yr)	Uncontrolled PM Emissions (lb/yr)	Uncontrolled PM Emissions (tpy)	Controlled PM Emissions* (tpy)
Grain receiving	25	67,200	0.79	53,088	59988.50	29.99	15.00
Grain shipping	25	67,200	0.79	53,088	59988.50	29.99	15.00
<b>Total</b>						59.99	29.99

\*Periodic sweeping will be done to provide control (50%) to PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions.

**PM<sub>10</sub> Emissions from Paved Roads**

Activity	Average Vehicle Weight (tons)	No. of Trucks (truck/yr)	Miles Traveled per Truck (miles/truck)	Annual Mileage (VMT/yr)	Uncontrolled PM <sub>10</sub> Emissions (lb/yr)	Uncontrolled PM <sub>10</sub> Emissions (tpy)	Controlled PM <sub>10</sub> Emissions* (tpy)
Grain receiving	25	67,200	0.79	53,088	11,687	5.84	2.92
Grain shipping	25	67,200	0.79	53,088	11,687	5.84	2.92
<b>Total</b>						11.69	5.84

\*Periodic sweeping will be done to provide control (50%) to PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions.

**PM<sub>2.5</sub> Emissions from Paved Roads**

Activity	Average Vehicle Weight (tons)	No. of Trucks (truck/yr)	Miles Traveled per Truck (miles/truck)	Annual Mileage (VMT/yr)	Uncontrolled PM <sub>2.5</sub> Emissions (lb/yr)	Uncontrolled PM <sub>2.5</sub> Emissions (tpy)	Controlled PM <sub>2.5</sub> Emissions* (tpy)
Grain receiving	25	67,200	0.79	53,088	1,739	0.87	0.43
Grain shipping	25	67,200	0.79	53,088	1,739	0.87	0.43
<b>Total</b>						1.74	0.87

\*Periodic sweeping will be done to provide control (50%) to PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions.

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MM BTU/HR >100**

**Company Name: Cargill AgHorizons - Linden Grain Elevator  
Address: 173 West County Road 1100 North, Linden, IN 47955  
Permit No.: F107-29227-00009  
Source ID: 107-00009  
Reviewer: Jason R. Krawczyk  
Date: November 5, 2010**

Heat Input Capacity (MMBtu/hr)	Unlimited Throughput (MMscf/yr)	Limited Throughput MM(scf/yr)
108.0	927.53	80.00

	PM*	PM10*	SO2	NOx**	VOC	CO
Unlimited Emission Factor (lb/MMSCF)	1.90	7.60	0.60	190	5.50	84.0
Limited Emission Factor (lb/MMSCF)	1.90	7.60	0.60	100	5.50	84.0
Unlimited Potential to Emit (tons/yr)	0.88	3.52	0.28	88.12	2.55	38.96
Limited Potential to Emit (tons/yr)	<b>0.08</b>	<b>0.30</b>	<b>0.02</b>	<b>4.00</b>	<b>0.22</b>	<b>3.36</b>

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

\*\*Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100 (See Table 1.4-1)

**Methodology:**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04

(AP-42 Supplement D 3/98)

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

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Unlimited Potential to Emit (tons/yr)	9.74E-04	5.57E-04	3.48E-02	8.35E-01	1.58E-03
Limited Potential to Emit (tons/yr)	<b>8.40E-05</b>	<b>4.80E-05</b>	<b>3.00E-03</b>	<b>7.20E-02</b>	<b>1.36E-04</b>

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Unlimited Potential to Emit (tons/yr)	2.32E-04	5.10E-04	6.49E-04	1.76E-04	9.74E-04
Limited Potential to Emit (tons/yr)	<b>2.00E-05</b>	<b>4.40E-05</b>	<b>5.60E-05</b>	<b>1.52E-05</b>	<b>8.40E-05</b>

**Methodology:**

Same as for Criteria Pollutants

Appendix A: Emissions Calculations  
Source-Wide Emission Summary

Company Name(s): Cargill AgHorizons - Linden Grain Elevator  
Valero Renewable Fuels Company, LLC - Valero Linden Plant  
Address(es): 173 West County Road 1100 North, Linden, IN 47955  
203 West County Road 1100 North, Linden, IN 47955  
Reviewer: Jason R. Krawczyk  
Date: November 5, 2010

Process, Emission Units, Stack	Control Device	Potential to Emit Before Control									
		PM	PM10	PM2.5	VOC	NOx	SO2	CO	Single HAP	Combined HAPs	
<b>Cargill AgHorizons - Linden Grain Elevator</b>											
Emission Units											
Grain Receiving, Handling, Storage, and Loadout (EU101) - EU106, EU108, C8, EU113, EU114) (EP-110)	Baghouse BH-1	255.29	255.29	255.29	-	-	-	-	-	-	-
Tank Reclaim Conveyor (C5) (EP-120)	Baghouse BH-2	187.71	187.71	187.71	-	-	-	-	-	-	-
Grain Dryer (EU100)	N/A	404.71	101.18	17.29	-	-	-	-	-	-	-
Grain Dryer Combustion (EU100)	N/A	0.88	3.52	3.52	2.55	88.12	0.28	38.96	-	0.88	
Fugitive Emissions											
Grain Receiving and Loadout	N/A	101.64	30.91	5.21	-	-	-	-	-	-	-
Tanks and Conveyors	N/A	153.58	76.52	13.08	-	-	-	-	-	-	-
Grain Storage Piles (EU111)	N/A	1.36	0.64	0.10	-	-	-	-	-	-	-
Paved Roads	N/A	59.99	11.69	1.74	-	-	-	-	-	-	-
Total Fugitive:	-	316.57	119.76	20.13	0.00	0.00	0.00	0.00	0.00	0.00	
Total (non-Fugitive):	-	848.60	547.71	463.82	2.55	88.12	0.28	38.96	0.00	0.88	
<b>Total (Fugitive + non-Fugitive)*:</b>	<b>-</b>	<b>1165.17</b>	<b>667.47</b>	<b>483.95</b>	<b>2.55</b>	<b>88.12</b>	<b>0.28</b>	<b>38.96</b>	<b>0.00</b>	<b>0.88</b>	
<b>Valero Renewable Fuels Company, LLC - Valero Linden Plant</b>											
Emission Units											
Corn Conveyor (EU001) (EP001)	CE001	563.14	563.14	563.14	-	-	-	-	-	-	
Hammermills (EU002 through EU005) (EP002)	CE002	525.60	525.60	525.60	-	-	-	-	-	-	
DDGS Handling and Loadout (EU035 through EU037) (EP005)	CE005	19.72	9.08	1.70	-	-	-	-	-	-	
DDGS Cooling Drum (EU046) (EP007 or EP003)	CE008, CE003, CE006	281.57	281.57	281.57	9.86	-	-	-	0.35	0.66	
Fermentation Scrubber (EU025 through EU032) (EP004)	CE004	-	-	-	2240.37	-	-	-	10.33	13.77	
DDGS Dryers (EU039, EU040, EU042, and EU043) & TO/HSRGs (EU006 through EU022) (EP003)	CE003 / CE006	156.63	167.94	167.94	454.47	160.05	6.75	965.12	14.02	46.95	
Ethanol Loadout & Flare (EU047) (EP008)	CE009	negl.	negl.	negl.	257.96	9.43	negl.	26.78	-	15.06	
Fire Pump (EU048) (EP009)	N/A	1.16	1.16	1.16	3.30	22.60	0.67	7.53	1.01	8.48	
Methanator (EU049) (EP003 or EP006)**	CE003 and CE006 or CE007	negl.	negl.	negl.	1.46	1.91	negl.	10.37	-	0.05	
Fugitive Emissions											
Uncaptured Emissions From Grain Receiving (F001)*	N/A	23.61	5.26	5.26	-	-	-	-	-	-	
Uncaptured Emissions From DDGS Handling (F002)*	N/A	0.18	0.05	0.05	-	-	-	-	-	-	
Truck Traffic (F003)*	N/A	23.13	4.50	0.67	-	-	-	-	-	-	
Equipment Leaks (F004)*	N/A	-	-	-	6.71	-	-	-	0.00	0.40	
Cooling Towers (F005)*	N/A	10.86	10.86	10.86	-	-	-	-	-	-	
Storage Tanks (T001 - T006)*	N/A	-	-	-	3.56	-	-	-	-	0.15	
Process Tanks	N/A	-	-	-	0.17	-	-	-	-	-	
Total Fugitive:	-	57.77	20.67	16.84	10.44	0.00	0.00	0.00	0.00	0.55	
<b>Total (non-Fugitive)**:</b>	<b>-</b>	<b>1547.82</b>	<b>1548.49</b>	<b>1541.11</b>	<b>2967.42</b>	<b>193.98</b>	<b>7.43</b>	<b>1009.81</b>	<b>25.70</b>	<b>85.52</b>	
Combined Total Fugitive:	-	374.34	140.43	36.97	10.44	0.00	0.00	0.00	0.00	0.55	
Combined Total (non-Fugitive)	-	2396.42	2096.20	2004.94	2969.97	282.10	7.70	1048.77	25.70	86.40	
<b>Combined Total (Towards Part 70, PSD, and Emission Offset)</b>	<b>-</b>	<b>2712.99</b>	<b>2215.95</b>	<b>2025.06</b>	<b>2969.97</b>	<b>282.10</b>	<b>7.70</b>	<b>1048.77</b>	<b>25.70</b>	<b>86.40</b>	

Notes:

\*Fugitive emissions for Cargill AgHorizons - Linden Grain Elevator are counted toward the determination of Part 70, PSD, and Emission Offset applicability because the New Source Performance Standard Subpart DD was in effect on August 7, 1980.

\*\*Fugitive PM, PM10, PM2.5, and VOC emissions for Valero Renewable Fuels Company, LLC - Valero Linden Plant are not counted toward the determination of Part 70, PSD, or Emission Offset applicability.

Cargill AgHorizons - Linden Grain Elevator emissions summaries from FESOP Renewal 107-29227-00009

**Appendix A: Emission Calculations  
Source-Wide Emissions Summary (continued)**

Process, Emission Units, Stack	Control Device	Potential to Emit After Control (ton/yr)								
		PM	PM10	PM2.5	VOC	NOx	SO2	CO	Single HAP	Combined HAPs
<b>Cargill AgHorizons - Linden Grain Elevator</b>										
Emission Units										
Grain Receiving, Handling, Storage, and Loadout (EU101 - EU106, EU108, C8, EU113, EU114)	Baghouse BH-1	2.55	2.55	2.55	-	-	-	-	-	-
Tank Reclaim Conveyor (C5)	Baghouse BH-2	1.88	1.88	1.88	-	-	-	-	-	-
Grain Dryer (EU100)	N/A	404.71	101.18	17.29	-	-	-	-	-	-
Grain Dryer Combustion (EU100)	N/A	0.88	3.52	3.52	2.55	88.12	0.28	38.96	-	0.88
Fugitive Emissions										
Grain Receiving and Loadout	N/A	10.16	3.09	0.52	-	-	-	-	-	-
Tanks and Conveyors	N/A	30.10	14.11	2.42	-	-	-	-	-	-
Grain Storage Piles (EU111)	N/A	1.36	0.64	0.10	-	-	-	-	-	-
Paved Roads	N/A	29.99	5.84	0.87	-	-	-	-	-	-
Total Fugitive:	-	71.62	23.68	3.90	0.00	0.00	0.00	0.00	0.00	0.00
Total (non-Fugitive):	-	410.02	109.13	25.25	2.55	88.12	0.28	38.96	0.00	0.88
<b>Total (Fugitive + non-Fugitive)*:</b>	<b>-</b>	<b>481.64</b>	<b>132.81</b>	<b>29.15</b>	<b>2.55</b>	<b>88.12</b>	<b>0.28</b>	<b>38.96</b>	<b>0.00</b>	<b>0.88</b>
<b>Valero Renewable Fuels Company, LLC - Valero Linden Plant</b>										
Emission Units										
Corn Conveyor (EU001) (EP001)	CE001	5.63	5.63	0.96	-	-	-	-	-	-
Hammermills (EU002 through EU005) (EP002)	CE002	5.26	5.26	0.89	-	-	-	-	-	-
DDGS Handling and Loadout (EU035 through EU037) (EP005)	CE005	0.20	0.09	0.02	-	-	-	-	-	-
DDGS Cooling Drum (EU046) (EP007 or EP003)	CE008, CE003, CE006	2.82	2.82	0.48	9.86	-	-	-	0.35	0.66
Fermentation Scrubber (EU025 through EU032) (EP004)	CE004	-	-	-	44.81	-	-	-	5.16	6.89
DDGS Dryers (EU039, EU040, EU042, and EU043) & TO/HSRGS (EU006 through EU022) (EP003)	CE003 / CE006	19.06	30.36	30.36	13.41	160.05	6.75	246.49	1.40	8.20
Ethanol Loadout & Flare (EU047) (EP008)	CE009	negl.	negl.	negl.	5.16	1.06	negl.	3.02	-	0.30
Fire Pump (EU048) (EP009)	N/A	1.16	1.16	1.16	3.30	22.60	0.67	7.53	1.01	8.48
Methanator (EU049) (EP003 or EP006)**	CE003 and CE006 or CE007	negl.	negl.	negl.	1.46	1.91	negl.	10.37	-	0.05
Fugitive Emissions										
Uncaptured Emissions From Grain Receiving (F001)*	N/A	23.61	5.26	5.26	-	-	-	-	-	-
Uncaptured Emissions From DDGS Handling (F002)*	N/A	0.18	0.05	0.05	-	-	-	-	-	-
Truck Traffic (F003)*	N/A	11.56	2.25	0.33	-	-	-	-	-	-
Equipment Leaks (F004)*	N/A	-	-	-	6.71	-	-	-	0.00	0.40
Cooling Towers (F005)*	N/A	10.86	10.86	10.86	-	-	-	-	-	-
Storage Tanks (T001 - T006)*	N/A	-	-	-	3.56	-	-	-	-	0.15
Process Tanks	N/A	-	-	-	0.17	-	-	-	-	-
Total Fugitive:	-	46.21	18.42	16.50	10.44	0.00	0.00	0.00	0.00	0.55
<b>Total (non-Fugitive)**:</b>	<b>-</b>	<b>34.11</b>	<b>45.32</b>	<b>33.87</b>	<b>77.99</b>	<b>185.62</b>	<b>7.43</b>	<b>267.42</b>	<b>7.92</b>	<b>25.12</b>
Combined Total Fugitive:	-	117.83	42.10	20.41	10.44	0.00	0.00	0.00	0.00	0.55
Combined Total (non-Fugitive)	-	444.14	154.45	59.12	80.54	273.73	7.70	306.38	7.92	26.00
<b>Combined Total (Towards Part 70, PSD, and Emission Offset)</b>	<b>-</b>	<b>515.75</b>	<b>178.13</b>	<b>63.02</b>	<b>80.54</b>	<b>273.73</b>	<b>7.70</b>	<b>306.38</b>	<b>7.92</b>	<b>26.00</b>

**Notes:**

\*Fugitive emissions for Cargill AgHorizons - Linden Grain Elevator are counted toward the determination of Part 70, PSD, and Emission Offset applicability because the New Source Performance Standard Subpart DD was in effect on August 7, 1980.

\*\*Fugitive PM, PM10, PM2.5, and VOC emissions for Valero Renewable Fuels Company, LLC - Valero Linden Plant are not counted toward the determination of Part 70, PSD, or Emission Offset applicability.

Cargill AgHorizons - Linden Grain Elevator emissions summaries from FESOP Renewal 107-29227-00009

**Appendix A: Emission Calculations  
Source-Wide Emissions Summary (continued)**

Process, Emission Units, Stack	Control Device	Limited Potential to Emit (ton/yr)									
		PM	PM10	PM2.5	VOC	NOx	SO2	CO	Single HAP	Combined HAPs	
<b>Cargill AgHorizons - Linden Grain Elevator</b>											
Emission Units											
Grain Receiving, Handling, Storage, and Loadout (EU101 - EU106, EU108, C8, EU113, EU114)	Baghouse BH-1	2.55	2.55	2.55	-	-	-	-	-	-	
Tank Reclaim Conveyor (C5)	Baghouse BH-2	1.88	1.88	1.88	-	-	-	-	-	-	
Grain Dryer (EU100)	N/A	46.20	11.55	11.55	-	-	-	-	-	-	
Grain Dryer Combustion (EU100)	N/A	0.08	0.30	0.30	0.22	4.00	0.02	3.36	-	0.08	
Fugitive Emissions											
Grain Receiving and Loadout	N/A	10.16	3.09	0.52	-	-	-	-	-	-	
Tanks and Conveyors	N/A	30.10	14.11	2.42	-	-	-	-	-	-	
Grain Storage Piles (EU111)	N/A	1.36	0.64	0.10	-	-	-	-	-	-	
Paved Roads	N/A	29.99	5.84	0.87	-	-	-	-	-	-	
Total Fugitive:	-	71.62	23.68	3.90	0.00	0.00	0.00	0.00	0.00	0.00	
Total (non-Fugitive):	-	50.71	16.29	16.29	0.22	4.00	0.02	3.36	0.00	0.08	
<b>Total (Fugitive + non-Fugitive)*:</b>	<b>-</b>	<b>122.33</b>	<b>39.97</b>	<b>20.19</b>	<b>0.22</b>	<b>4.00</b>	<b>0.02</b>	<b>3.36</b>	<b>0.00</b>	<b>0.08</b>	
<b>Valero Renewable Fuels Company, LLC - Valero Linden Plant</b>											
Emission Units											
Corn Conveyor (EU001) (EP001)	CE001	5.65	5.65	5.65	-	-	-	-	-	-	
Hammermills (EU002 through EU005) (EP002)	CE002	5.26	5.26	5.26	-	-	-	-	-	-	
DDGS Handling and Loadout (EU035 through EU037) (EP005)	CE005	1.71	1.71	1.71	-	-	-	-	-	-	
DDGS Cooling Drum (EU046) (EP007 or EP003)	CE008, CE003, CE006	4.69	4.69	4.69	4.97	-	-	-	0.44	0.66	
Fermentation Scrubber (EU025 through EU032) (EP004)	CE004	2.50	2.50	2.50	44.81	-	-	-	5.17	6.92	
DDGS Dryers (EU039, EU040, EU042, and EU043) & TO/HSRGS (EU006 through EU022) (EP003)	CE003 / CE006	38.94	38.94	38.94	40.30	93.95	93.03	92.42	4.34	11.34	
Ethanol Loadout & Flare (EU047) (EP008)	CE009	negl.	negl.	negl.	5.10	1.06	negl.	3.02	-	0.30	
Fire Pump (EU048) (EP009)	N/A	0.03	0.03	0.03	0.09	0.04	0.02	0.01	0.03	0.24	
Methanator (EU049) (EP003 or EP006)**	CE003 and CE006 or CE007	negl.	negl.	negl.	0.15	0.19	negl.	1.04	-	0.05	
Fugitive Emissions											
Uncaptured Emissions From Grain Receiving (F001)*	N/A	23.61	5.26	5.26	-	-	-	-	-	-	
Uncaptured Emissions From DDGS Handling (F002)*	N/A	0.18	0.05	0.05	-	-	-	-	-	-	
Truck Traffic (F003)*	N/A	11.56	2.25	0.33	-	-	-	-	-	-	
Equipment Leaks (F004)*	N/A	-	-	-	6.71	-	-	-	0.00	0.40	
Cooling Towers (F005)*	N/A	10.86	10.86	10.86	-	-	-	-	-	-	
Storage Tanks (T001 - T006)*	N/A	-	-	-	3.56	-	-	-	-	0.15	
Process Tanks	N/A	-	-	-	0.17	-	-	-	-	-	
Total Fugitive:	-	46.21	18.42	16.50	10.44	0.00	0.00	0.00	0.00	0.55	
<b>Total (non-Fugitive)**:</b>	<b>-</b>	<b>58.77</b>	<b>58.77</b>	<b>58.77</b>	<b>95.41</b>	<b>95.24</b>	<b>93.05</b>	<b>96.49</b>	<b>9.97</b>	<b>20.07</b>	
Combined Total Fugitive:	-	117.83	42.10	20.41	10.44	0.00	0.00	0.00	0.00	0.55	
Combined Total (non-Fugitive)	-	109.48	75.06	75.06	95.63	99.24	93.07	99.85	9.97	20.14	
<b>Combined Total (Towards Part 70, PSD, and Emission Offset)</b>	<b>-</b>	<b>181.09</b>	<b>98.74</b>	<b>78.96</b>	<b>95.63</b>	<b>99.24</b>	<b>93.07</b>	<b>99.85</b>	<b>9.97</b>	<b>20.14</b>	

**Notes:**

\*Fugitive emissions for Cargill AgHorizons - Linden Grain Elevator are counted toward the determination of Part 70, PSD, and Emission Offset applicability because the New Source Performance Standard Subpart DD was in effect on August 7, 1980.

\*\*Fugitive PM, PM10, PM2.5, and VOC emissions for Valero Renewable Fuels Company, LLC - Valero Linden Plant are not counted toward the determination of Part 70, PSD, or Emission Offset applicability.

Cargill AgHorizons - Linden Grain Elevator emissions summaries from FESOP Renewal 107-29227-00009



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

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

**TO:** Jim Simpson  
Cargill AgHorizons - Linden Grain Elevator  
173 W CR 1100 N  
Linden, IN 47955

**DATE:** December 28, 2010

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

**SUBJECT:** Final Decision  
FESOP  
107-29227-00009

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

December 28, 2010

TO: Linden Carnegie Public Library

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

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

**Applicant Name: Cargill AgHorizons – Linden Grain Elevator**  
**Permit Number: 107-29227-00009**

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	CDENNY 12/28/2010 Cargill AgHorizons - Linden Grain Elevator 107-29227-00009 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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1		Jim Simpson Cargill AgHorizons - Linden Grain Elevator 173 W CR 1100 N Linden IN 47955 (Source CAATS)										
2		Marc Mears Farm Svcs Grp Leader Cargill AgHorizons - Linden Grain Elevator 173 W CR 1100 N Linden IN 47955 (RO CAATS)										
3		Montgomery County Health Department 110 W. South Blvd Suite 100 Crawfordsville IN 47933-3351 (Health Department)										
4		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
5		Mr. Robert Ford RR 1, Box 233 New Ross IN 47968 (Affected Party)										
6		Ms. Magie Read P.O. Box 248 Battle Ground IN 47920 (Affected Party)										
7		Linden Carnegie Public 102 South Main St, P.O. Box 10 Linden IN 47955-0010 (Library)										
8		Montgomery County Commissioner 110 West South Boulevard Crawfordsville IN 47933 (Local Official)										
9		Terry & Patricia French 606 Ridgeway Ct. Crawfordsville IN 47933 (Affected Party)										
10		Linden Town Council P.O. Box 352, 302 East Water Linden IN 47955 (Local Official)										
11		Kevin Miller United States Compliance Corp. 4350 Baker Road, Suite 100 Minntonka MN 55343 (Consultant)										
12												
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