



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

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Federally Enforceable State Operating Permit (FESOP) with New Source Review

for ADM Grain Company in Fountain County

Permit No. F045-29376-00016

The Indiana Department of Environmental Management (IDEM), has received an application from ADM Grain located at 105 East Harrison, Attica, Indiana 47918 to transition their Minor Source Operating Permit (MSOP) No. M045-21754-00016, issued on April 6, 2006 to a Federally Enforceable State Operating Permit (FESOP) with New Source Review to accommodate an increased grain throughput. If approved by IDEM's Office of Air Quality (OAQ), this proposed FESOP would allow ADM Grain Company to continue to operate their existing grain elevator.

This draft FESOP does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed or removed. This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow for these changes.

A copy of the permit application and IDEM's preliminary findings are available at:

Attica Public Library
305 South Perry
Attica, IN 47918

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit

application, please contact IDEM at the address below. Please refer to permit number F045-29376-00016 in all correspondence.

Comments should be sent to:

Summer Keown
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5175
Or dial directly: (317) 234-5175
E-mail: skeown@idem.in.gov

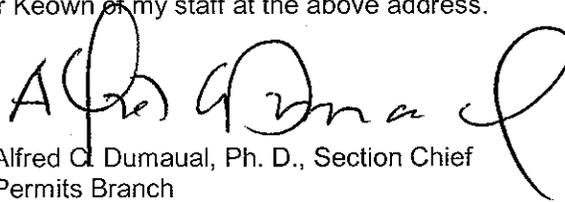
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions please contact Summer Keown or my staff at the above address.


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

SJK



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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DRAFT

Federally Enforceable State Operating Permit with New Source Review OFFICE OF AIR QUALITY

**ADM Grain Company
105 East Harrison
Attica, Indiana 47918**

(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.: F045-29376-00016	
Issued by:	Issuance Date:
Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date:

TABLE OF CONTENTS

A. SOURCE SUMMARY	4
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
B. GENERAL CONDITIONS	6
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
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]	
B.16 Permit Renewal [326 IAC 2-8-3(h)]	
B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19 Source Modification Requirement [326 IAC 2-8-11.1]	
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]	
B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
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]	
B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]	
B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	16
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]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]	
C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-8-4(3)]	
C.9 Performance Testing [326 IAC 3-6]	

Compliance Requirements [326 IAC 2-1.1-11]

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

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

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

- C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 23

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Particulate Matter Limitations [326 IAC 2-2]
- D.1.2 FESOP Limit [326 IAC 2-8-4]
- D.1.3 Particulate Limitations [326 IAC 6-3-2]
- D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.1.5 Particulate Control

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

- D.1.6 Visible Emission Notations

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

- D.1.7 Record Keeping Requirement

E.1. EMISSIONS UNIT OPERATION CONDITIONS..... 27

- E.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR 60, Subpart A]
- E.1.2 New Source Performance Standard (NSPS) for Grain Elevators [40 CFR 60, Subpart DD][326 IAC 12-1]

Certification Form..... 29

Emergency Occurrence Form..... 30

Quarterly Deviation and Compliance Monitoring Report Form..... 32

Attachment A: Fugitive Dust Control Plan

Attachment B: New Source Performance Standards (NSPS) for Grain Elevators [40 CFR 60, Subpart DD]

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)]

The Permittee owns and operates a stationary grain elevator.

Source Address:	105 East Harrison, Attica, Indiana 47918
General Source Phone Number:	(765) 762-6763
SIC Code:	5153
County Location:	Fountain
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 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:

One (1) grain elevator with a maximum capacity of 30,000,000 bushels per year or 900,000 tons per year, consisting of the following equipment:

- (a) One (1) truck receiving operation, identified as EP-01, consisting of the following equipment:
 - (1) One (1) truck receiving pit, identified as #1, with a maximum throughput of 20,000 bushels per hour.
 - (2) Two (2) truck receiving pits, identified as #2 and #3, with a maximum throughput of 13,000 bushels per hour each (only one conveyor for both pits).
 - (3) One (1) truck receiving pit, identified as ring, with a maximum throughput of 15,000 bushels per hour.
- (b) One (1) grain cleaner, identified as EP-02, with a maximum throughput of 30,000 bushels per hour, equipped with enclosures for particulate control.
- (c) One (1) natural gas-fired column grain dryer, identified as EP-03, with a maximum heat input capacity of 26 MMBtu per hour, with a maximum throughput of 4,000 bushels per hour.
- (d) One (1) natural gas-fired column grain dryer, identified as EP-07, with a maximum heat input capacity of 65.8 MMBtu per hour, approved for construction in 2009, with a maximum throughput of 6,000 bushels per hour.
- (e) One (1) internal handling operation, identified as EP-04, constructed in 2003 and approved for modification in 2009, with a maximum throughput of 30,000 bushels per

hour, equipped with enclosures for particulate control. The internal handling operation consists of augers, belt conveyors, bucket elevator, and drag conveyors.

- (f) One (1) truck loadout operation, identified as EP-05, consisting of the following equipment:
 - (1) One (1) truck loadout, with a maximum throughput of 25,000 bushels per hour, equipped with socks/sleeves for particulate control.
 - (2) One (1) truck loadout, identified as side draw loadout, with a maximum throughput of 12,000 bushels per hour per each spout, equipped with socks/sleeves for particulate control.
- (g) One (1) rail loadout, identified as EP-06, with a maximum throughput of 40,000 bushels per hour, equipped with socks/sleeves for particulate control.

Pursuant to 40 CFR 60, Subpart DD, the units listed above are considered affected facilities [40 CFR 60, Subpart DD].

- (h) Two (2) storage bins, identified as bins 1 and 2, each with a maximum capacity of 67,294 bushels.
- (i) One (1) storage bin, identified as bin 3, with a maximum capacity of 9,564 bushels.
- (j) Two (2) storage bins, identified as bins 5 and 6, each with a maximum capacity of 25,135 bushels.
- (k) One (1) storage bin, identified as bin 7, with a maximum capacity of 26,007 bushels.
- (l) One (1) storage bin, identified as bin 8, with a maximum capacity of 19,916 bushels.
- (m) One (1) storage bin, identified as bin 9, with a maximum capacity of 9,779 bushels.
- (n) One (1) storage bin, identified as bin 10, with a maximum capacity of 36,243 bushels.
- (o) Three (3) storage bins, identified as bins 11, 12, and 13, each with a maximum capacity of 121,228 bushels.
- (p) One (1) storage bin, identified as bin 14, with a maximum capacity of 273,931 bushels.
- (q) One (1) storage bin, identified as bin 15, with a maximum capacity of 433,465 bushels.
- (r) One (1) storage bin, identified as bin 16, with a maximum capacity of 651,000 bushels.
- (s) One (1) storage bin, identified as bin 26 (overhead bin), with a maximum capacity of 3,329 bushels.
- (t) Fugitive dust emissions from unpaved haul roads.

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

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 FESOP Applicability [326 IAC 2-8-2]

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) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

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

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

- (a) This permit, F045-29376-00016, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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)]

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)]

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)]

- (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)]

- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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) If required by specific condition(s) in Section D of this permit, 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.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. 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).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (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 F045-29376-00016 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)]

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]

- (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)]

- (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]

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]

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 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(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]

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. 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.9 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. 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.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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.12 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.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

The ERP 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) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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.15 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.16 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.17 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.18 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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:

One (1) grain elevator with a maximum capacity of 30,000,000 bushels per year or 900,000 tons per year, consisting of the following equipment:

- (a) One (1) truck receiving operation, identified as EP-01, consisting of the following equipment:
 - (1) One (1) truck receiving pit, identified as #1, with a maximum throughput of 20,000 bushels per hour.
 - (2) Two (2) truck receiving pits, identified as #2 and #3, with a maximum throughput of 13,000 bushels per hour each (only one conveyor for both pits).
 - (3) One (1) truck receiving pit, identified as ring, with a maximum throughput of 15,000 bushels per hour.
- (b) One (1) grain cleaner, identified as EP-02, with a maximum throughput of 30,000 bushels per hour, equipped with enclosures for particulate control.
- (c) One (1) natural gas-fired column grain dryer, identified as EP-03, with a maximum heat input capacity of 26 MMBtu per hour, with a maximum throughput of 4,000 bushels per hour.
- (d) One (1) natural gas-fired column grain dryer, identified as EP-07, with a maximum heat input capacity of 65.8 MMBtu per hour, approved for construction in 2009, with a maximum throughput of 6,000 bushels per hour.
- (e) One (1) internal handling operation, identified as EP-04, constructed in 2003 and approved for modification in 2009, with a maximum throughput of 30,000 bushels per hour, equipped with enclosures for particulate control. The internal handling operation consists of augers, belt conveyors, bucket elevator, and drag conveyors.
- (f) One (1) truck loadout operation, identified as EP-05, consisting of the following equipment:
 - (1) One (1) truck loadout, with a maximum throughput of 25,000 bushels per hour, equipped with socks/sleeves for particulate control.
 - (2) One (1) truck loadout, identified as side draw loadout, with a maximum throughput of 12,000 bushels per hour per each spout, equipped with socks/sleeves for particulate control.
- (g) One (1) rail loadout, identified as EP-06, with a maximum throughput of 40,000 bushels per hour, equipped with socks/sleeves for particulate control.

Pursuant to 40 CFR 60, Subpart DD, the units listed above are considered affected facilities [40 CFR 60, Subpart DD].

- (h) Two (2) storage bins, identified as bins 1 and 2, each with a maximum capacity of 67,294 bushels.
- (i) One (1) storage bin, identified as bin 3, with a maximum capacity of 9,564 bushels.

- (j) Two (2) storage bins, identified as bins 5 and 6, each with a maximum capacity of 25,135 bushels.
- (k) One (1) storage bin, identified as bin 7, with a maximum capacity of 26,007 bushels.
- (l) One (1) storage bin, identified as bin 8, with a maximum capacity of 19,916 bushels.
- (m) One (1) storage bin, identified as bin 9, with a maximum capacity of 9,779 bushels.
- (n) One (1) storage bin, identified as bin 10, with a maximum capacity of 36,243 bushels.
- (o) Three (3) storage bins, identified as bins 11, 12, and 13, each with a maximum capacity of 121,228 bushels.
- (p) One (1) storage bin, identified as bin 14, with a maximum capacity of 273,931 bushels.
- (q) One (1) storage bin, identified as bin 15, with a maximum capacity of 433,465 bushels.
- (r) One (1) storage bin, identified as bin 16, with a maximum capacity of 651,000 bushels.
- (s) One (1) storage bin, identified as bin 26 (overhead bin), with a maximum capacity of 3,329 bushels.
- (t) Fugitive dust emissions from unpaved haul roads.

(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 Particulate Matter Limitations [326 IAC 2-2]

- (1) The PM emissions from the internal handling operation, identified as EP-04, shall not exceed 1.37 pounds per hour.
- (2) The PM emissions from the grain cleaning operation, identified as EP-02, shall not exceed 0.91 pound per hour.
- (3) The PM emissions from the truck loadout operation, identified as EP-05, shall not exceed 0.91 pound per hour.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, 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 (Prevention of Significant Deterioration (PSD)) not applicable.

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

The PM10 emissions from the internal handling operation, identified as EP-04, shall not exceed 2.28 pounds per hour.

Compliance with this limit, combined with the potential to emit PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 to less than 100 tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

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

The particulate matter (PM) limitations of the grain handling operations are as follows:

Emission Unit	Process Weight Rate (lbs/hr)	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr)
Truck Receiving Pit #1	1,200,000	71.2
Truck Receiving Pits #2 and #3	780,000 (each)	66.0 (each)
Truck Receiving Pit Ring	900,000	67.70
Grain Cleaner EP-02	1,800,000	76.2
Grain Dryer EP-03	240,000	53.1
Grain Dryer EP-07	360,000	57.4
Internal Handling Operation EP-04	1,800,000	76.2
Truck Loadout EP-05	1,500,000	73.9
Side Draw Loadout	720,000	65.1
Rail Loadout EP-06	2,400,000	80.0
Storage Bins #1 - #3, #5 - #16, #26	1,800,000 (each)	76.2 (each)

The pounds per hour limitations above were calculated with 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:

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

When the process weight rate exceeds two hundred (200) tons per hour, the maximum allowable emission may exceed that shown in the table above, provided the concentration of particulate matter in the discharge gases to the atmosphere is less than 0.10 pounds per one thousand (1,000) pounds of gases.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and any 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 Control

In order to comply with Condition D.1.1 and D.1.2, the enclosures shall be in operation at all times that the internal handling operation, identified as EP-04, and the grain cleaning operation, identified as EP-02, are in operation and the socks/sleeves shall be in operation at all times that the truck loadout operation, identified as EP-05, is in operation.

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

D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of the internal handling operation, the grain cleaning operation, and the truck loadout operation shall be performed 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) Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the internal handling operation, the grain cleaning operation, and the truck loadout operation. 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).
- (b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

One (1) grain elevator with a maximum capacity of 30,000,000 bushels per year or 900,000 tons per year, consisting of the following equipment:

- (a) One (1) truck receiving operation, identified as EP-01, consisting of the following equipment:
 - (1) One (1) truck receiving pit, identified as #1, with a maximum throughput of 20,000 bushels per hour.
 - (2) Two (2) truck receiving pits, identified as #2 and #3, with a maximum throughput of 13,000 bushels per hour each (only one conveyor for both pits).
 - (3) One (1) truck receiving pit, identified as ring, with a maximum throughput of 15,000 bushels per hour.
- (b) One (1) grain cleaner, identified as EP-02, with a maximum throughput of 30,000 bushels per hour, equipped with enclosures for particulate control.
- (c) One (1) column grain dryer, identified as EP-03, with a maximum heat input capacity of 26 MMBtu per hour, with a maximum throughput of 4,000 bushels per hour.
- (d) One (1) column grain dryer, identified as EP-07, with a maximum heat input capacity of 65.8 MMBtu per hour, approved for construction in 2009, with a maximum throughput of 6,000 bushels per hour.
- (e) One (1) internal handling operation, identified as EP-04, constructed in 2003 and approved for modification in 2009, with a maximum throughput of 30,000 bushels per hour, equipped with enclosures for particulate control. The internal handling operation consists of augers, belt conveyors, bucket elevator, and drag conveyors.
- (f) One (1) truck loadout operation, identified as EP-05, consisting of the following equipment:
 - (1) One (1) truck loadout, with a maximum throughput of 25,000 bushels per hour, equipped with socks/sleeves for particulate control.
 - (2) One (1) truck loadout, identified as side draw loadout, with a maximum throughput of 12,000 bushels per hour per each spout, equipped with socks/sleeves for particulate control.
- (g) One (1) rail loadout, identified as EP-06, with a maximum throughput of 40,000 bushels per hour, equipped with socks/sleeves for particulate control.

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

E.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the receiving, internal handling, grain cleaner, grain dryers, and loadout facilities except when otherwise specified in 40 CFR 60, Subpart DD.

E.1.2 New Source Performance Standards (NSPS) for Grain Elevators [40 CFR 60, Subpart DD]
[326 IAC 12-1]

The Permittee, which operates a grain storage elevator which commenced construction after August 3, 1978, shall comply with the following provisions of 40 CFR Part 60, Subpart DD (included as Attachment B of this permit), which are incorporated by reference as 326 IAC 12:

- (a) 40 CFR 60.300
- (b) 40 CFR 60.301
- (c) 40 CFR 60.302
- (d) 40 CFR 60.303
- (e) 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: ADM Grain Company
Source Address: 105 East Harrison, Attica, Indiana 47918
FESOP Permit No.: F045-29376-00016

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: ADM Grain Company
Source Address: 105 East Harrison, Attica, Indiana 47918
FESOP Permit No.: F045-29376-00016

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">• 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• 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 |
|--|

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 ₂ , VOC, NO _x , 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**

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

Source Name: ADM Grain Company
Source Address: 105 East Harrison, Attica, Indiana 47918
FESOP Permit No.: F045-29376-00016

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____



**Attachment A: Fugitive Dust Control Plan
FESOP No. F045-29376-00016**

**ADM Grain Company
105 East Harrison Street
Attica, IN 47918**

Procedure for Dust Control on Unpaved Driveway

Purpose: Control fugitive emissions from the unpaved roadways

Soapstock or an equivalent material will be used to control dust from unpaved driveways. This will be done on as needed basis to control nuisance dust. Dust control is typically applied each summer.

1. Gravel driveway must be graded and worked to bring loose gravel to the top
2. Soapstock or equivalent material will then be applied to the driveway
3. Temperature must be above 70 degrees F to allow the material to be absorbed into the drive
4. Traffic must be restricted from the driveway for 3 days to allow the material to set-up
5. The driveway must be dry when applying the soapstock.

Attachment B: New Source Performance Standards
Subpart DD Standards of Performance for Grain Elevators
for
ADM Grain Company
FESOP No. F045-29376-00016

Title 40: Protection of Environment

PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

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 m³ (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 m³ (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, scalpels, 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 ft³ /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 Minor Source Operating Permit (MSOP) Transitioning to a New Source Review and Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	ADM Grain Company
Source Location:	105 East Harrison, Attica, IN 47918
County:	Fountain
SIC Code:	5153
Operation Permit No.:	F045-29376-00016
Permit Reviewer:	Summer Keown

On June 21, 2010, the Office of Air Quality (OAQ) received an application from ADM Grain Company related to the transition of a MSOP to a FESOP with New Source Review.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP No. M045-21754-00016, issued on April 6, 2006; and
- (b) Notice-Only Change No. 045-27659-00016, issued on May 15, 2009.

Due to this application, the source is transitioning from a MSOP to a FESOP.

County Attainment Status

The source is located in Fountain County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. 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. Fountain 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) **PM_{2.5}**
Fountain County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on 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 PM_{2.5} emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
Fountain County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by ADM Grain Company on June 21, 2010, relating to an increase in their maximum source-wide throughput of grain and a transition from a MSOP to a FESOP with New Source Review.

One (1) grain elevator with a maximum capacity of 30,000,000 bushels per year or 900,000 tons per year, consisting of the following equipment:

- (a) One (1) truck receiving operation, identified as EP-01, consisting of the following equipment:
- (1) One (1) truck receiving pit, identified as #1, with a maximum throughput of 20,000 bushels per hour.
 - (2) Two (2) truck receiving pits, identified as #2 and #3, with a maximum throughput of 13,000 bushels per hour each (only one conveyor for both pits).
 - (3) One (1) truck receiving pit, identified as ring, with a maximum throughput of 15,000 bushels per hour.
- (b) One (1) grain cleaner, identified as EP-02, with a maximum throughput of 30,000 bushels per hour, equipped with enclosures for particulate control.
- (c) One (1) natural gas-fired column grain dryer, identified as EP-03, with a maximum heat input capacity of 26 MMBtu per hour, with a maximum throughput of 4,000 bushels per hour.
- (d) One (1) natural gas-fired column grain dryer, identified as EP-07, with a maximum heat input capacity of 65.8 MMBtu per hour, approved for construction in 2009, with a maximum throughput of 6,000 bushels per hour.
- (e) One (1) internal handling operation, identified as EP-04, constructed in 2003 and approved for modification in 2009, with a maximum throughput of 30,000 bushels per hour, equipped with enclosures for particulate control. The internal handling operation consists of augers, belt conveyors, bucket elevator, and drag conveyors.

- (f) One (1) truck loadout operation, identified as EP-05, consisting of the following equipment:
 - (1) One (1) truck loadout, with a maximum throughput of 25,000 bushels per hour, equipped with socks/sleeves for particulate control.
 - (2) One (1) truck loadout, identified as side draw loadout, with a maximum throughput of 12,000 bushels per hour per each spout, equipped with socks/sleeves for particulate control.
- (g) One (1) rail loadout, identified as EP-06, with a maximum throughput of 40,000 bushels per hour, equipped with socks/sleeves for particulate control.
- (h) Two (2) storage bins, identified as bins 1 and 2, each with a maximum capacity of 67,294 bushels.

Pursuant to 40 CFR 60, Subpart DD, the units listed above are considered affected facilities [40 CFR 60, Subpart DD].

- (i) One (1) storage bin, identified as bin 3, with a maximum capacity of 9,564 bushels.
- (j) Two (2) storage bins, identified as bins 5 and 6, each with a maximum capacity of 25,135 bushels.
- (k) One (1) storage bin, identified as bin 7, with a maximum capacity of 26,007 bushels.
- (l) One (1) storage bin, identified as bin 8, with a maximum capacity of 19,916 bushels.
- (m) One (1) storage bin, identified as bin 9, with a maximum capacity of 9,779 bushels.
- (n) One (1) storage bin, identified as bin 10, with a maximum capacity of 36,243 bushels.
- (o) Three (3) storage bins, identified as bins 11, 12, and 13, each with a maximum capacity of 121,228 bushels.
- (p) One (1) storage bin, identified as bin 14, with a maximum capacity of 273,931 bushels.
- (q) One (1) storage bin, identified as bin 15, with a maximum capacity of 433,465 bushels.
- (r) One (1) storage bin, identified as bin 16, with a maximum capacity of 651,000 bushels.
- (s) One (1) storage bin, identified as bin 26 (overhead bin), with a maximum capacity of 3,329 bushels.
- (t) Fugitive dust emissions from unpaved haul roads.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Grain Drying Operation EP-03 and EP-07	99.00	24.75	4.23	0.00	0.00	0.00	0.00	0.00	0.00
Truck Loadout Operation EP-05	<4.00	13.05	2.21	0.00	0.00	0.00	0.00	0.00	0.00
Storage Bins	11.25	2.84	0.50	0.00	0.00	0.00	0.00	0.00	0.00
Column Grain Dryer - Combustion EP-03 and EP-07	0.76	3.06	3.06	0.24	40.21	2.21	33.78	negl.	negl.
Fugitive Emissions from Unpaved Roads	74.90	15.56	15.56	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Entire Source	<248.29	<92.74	34.75	0.24	40.21	2.21	33.78	negl.	negl.
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
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) 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), the source shall comply with the following:

- (1) The PM10 emissions from the internal handling operation, identified as EP-04, shall not exceed 2.28 pounds per hour.

The particulate control device associated with the internal handling operation is required to be operated at all times that this units is in operation in order to comply with this limit.

Compliance with this limit, combined with the potential to emit PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 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 (Prevention of Significant Deterioration (PSD)) not applicable.

(b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit for PM is limited to less than 250 tons per year, each, and the potential to emit all other attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (1) The PM emissions from the internal handling operation, identified as EP-04, shall not exceed 1.37 pounds per hour.
- (2) The PM emissions from the grain cleaning operation, identified as EP-02, shall not exceed 0.91 pound per hour.
- (3) The PM emissions from the truck loadout operation, identified as EP-05, shall not exceed 0.91 pound per hour.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, 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 (Prevention of Significant Deterioration (PSD)) not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The receiving, internal handling, grain cleaner, grain dryer, and loadout facilities remain subject to the New Source Performance Standards for Grain Elevators (40 CFR 60, Subpart DD), because they are located at a grain elevator which has a permanent storage capacity of more than 2.5 million U.S. bushels and they commenced construction after August 3, 1978.

Applicable portions of the NSPS are the following:

- (a) 40 CFR 60.300
- (b) 40 CFR 60.301
- (c) 40 CFR 60.302
- (d) 40 CFR 60.303
- (e) 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 the facilities 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 permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

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

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.

State Rule Applicability Determination

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.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the existing units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (e) 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.
- (f) 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.
- (g) 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.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is subject to the requirements of 326 IAC 6-5, because the unpaved roads have potential fugitive particulate emissions greater than 25 tons per year. Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, submitted on September 12, 2005, which is included as Attachment A to the permit.

Grain Handling Operations

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Each process at the grain elevator has a process weight rate in excess of sixty thousand (60,000) pounds per hour. All processing is assumed to be corn, which has a weight of 60 pounds per bushel. The maximum allowable particulate emission from each process shall be limited by the following:

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

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

The particulate matter (PM) limitations of the grain handling operations are as follows:

Emission Unit	Process Weight Rate (lbs/hr)	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr)
Truck Receiving Pit #1	1,200,000	71.2
Truck Receiving Pits #2 and #3	780,000 (each)	66.0 (each)
Truck Receiving Pit Ring	900,000	67.70
Grain Cleaner EP-02	1,800,000	76.2
Grain Dryer EP-03	240,000	53.1
Grain Dryer EP-07	360,000	57.4
Internal Handling Operation EP-04	1,800,000	76.2
Truck Loadout EP-05	1,500,000	73.9
Side Draw Loadout	720,000	65.1
Rail Loadout EP-06	2,400,000	80.0
Storage Bins #1 - #3, #5 - #16, #26	1,800,000 (each)	76.2 (each)

When the process weight rate exceeds two hundred (200) tons per hour, the maximum allowable emission may exceed that shown in the table above, provided the concentration of particulate matter in the discharge gases to the atmosphere is less than 0.10 pounds per one thousand (1,000) pounds of gases.

- (i) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 The proposed revision is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each unit is less than twenty-five (25) tons per year.
- (j) There are no other 326 IAC 8 Rules that are applicable to the grain handling operations.

Compliance Determination, Monitoring and Testing Requirements

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

- (a) The particulate control devices associated with the internal handling operation, grain cleaning operation, and truck loadout operation are required to be operated at all times that these units are in operation in order to comply with the applicable PM and PM10 limits.
- (b) The following monitoring requirements are applicable to the listed units:

Emission Unit/Control	Operating Parameters	Frequency
Internal Handling Enclosures	Visible Emission Notations	Once per day
Grain Cleaning Enclosures	Visible Emission Notations	Once per day
Truck Shipping Socks/Sleeves	Visible Emission Notations	Once per day

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 June 21, 2010.

The operation of this source shall be subject to the conditions of the attached proposed FESOP with New Source Review. No. F045-29376-00016. The staff recommends to the Commissioner that this FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Summer Keown at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.
- (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.in.gov/idem

**Appendix A: Emissions Calculations
Summary**

Company Name: ADM Grain Company
Location: 105 East Harrison, Attica, IN 47918
Permit No: F045-29376-00016
Permit Reviewer: Summer Keown
Date: August 16, 2010

Uncontrolled Potential Emissions

Process Name	Potential Emissions (tons per year)								
	PM	PM10	PM2.5	VOC	CO	NOx	SO ₂	Total HAPs	Highest Individual HAP
Grain Handling	286.74	97.87	19.19	2.21	33.78	40.21	0.24	negl.	negl.
Unpaved Roads	74.90	15.56	15.56	0.00	0.00	0.00	0.00	0.00	0.00
Total	361.64	113.43	34.75	2.21	33.78	40.21	0.24	negl.	negl.

Limited Potential Emissions

Process Name	Potential Emissions (tons per year)								
	PM*	PM10*	PM2.5	VOC	CO	NOx	SO ₂	Total HAPs	Highest Individual HAP
Grain Handling	<173.39	<77.56	19.19	2.21	33.78	40.21	0.24	negl.	negl.
Unpaved Roads	74.90	15.56	15.56	0.00	0.00	0.00	0.00	0.00	0.00
Total	<248.29	<92.74	34.75	2.21	33.78	40.21	0.24	negl.	negl.

*The particulate control device for the internal handling operation is required to comply with the PM and PM10 limits. The particulate control devices for the cleaning and truck loadout operations are required by the permit to comply such that PSD 326 IAC 2-2 is not applicable and to be in compliance with 326 IAC 2-8.

**Appendix A: Emissions Calculations
Grain Handling and Drying
Potential Emissions Without Controls**

Company Name: ADM Grain Company
Location: 105 East Harrison, Attica, IN 47918
Permit No: F045-29376-00016
Permit Reviewer: Summer Keown
Date: August 16, 2010

Maximum Annual Grain Throughput (bushels/year)	Maximum Annual Grain Throughput (tons/year)	Dryer Maximum Heat Input Capacity (MMBtu/hr)	Dryer Maximum Hours of Operation (hours/year)	Dryer Maximum Fuel Usage Rate (MMCF/year)
30,000,000	900,000	91.8	8760	804.17

Process/Activity	Maximum Annual Grain Throughput (tons/year)	AP-42 Emission Factor (lb/ton)*			Uncontrolled Potential to Emit (tons/year)						
		PM	PM10	PM2.5	PM	PM10	PM2.5	NOx	SO2	CO	VOC
Receiving by Straight Truck	450,000	0.180	0.059	0.010	40.50	13.28	2.25	0.0	0.0	0.0	0.0
Receiving by Hopper Truck	450,000	0.035	0.0078	0.0013	7.88	1.76	0.29	0.0	0.0	0.0	0.0
Internal Handling	1,800,000	0.061	0.034	0.0058	54.90	30.60	5.22	0.0	0.0	0.0	0.0
Cleaning	900,000	0.075	0.019	0.0032	33.75	8.55	1.44	0.0	0.0	0.0	0.0
Grain Drying	900,000	0.220	0.055	0.0094	99.00	24.75	4.23	0.0	0.0	0.0	0.0
Grain Dryer Fuel Combustion	---	see below			0.76	3.06	3.06	40.21	0.24	33.78	2.21
Shipping by Truck (worst case)	900,000	0.086	0.029	0.0049	38.70	13.05	2.21	0.0	0.0	0.0	0.0
Storage Bin Vents	900,000	0.025	0.0063	0.0011	11.25	2.84	0.50	0.0	0.0	0.0	0.0
Totals					286.74	97.87	19.19	40.21	0.24	33.78	2.21

Process/Activity	AP-42 Emission Factor (lb/MMCF)**						
	PM	PM10	PM2.5	CO	NOx	SO2	VOC
Grain Dryer Fuel Combustion	1.9	7.6	7.6	84.0	100	0.6	5.5

Methodology

* AP-42 Factors are from Chapter 1.9, Table 9.9.1-1. Particulate Emission Factors for Grain Elevators

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

Dryer Maximum Fuel Usage Rate (MMCF/year) = [Maximum Heat Input Capacity (MMBtu/hr)] x [Maximum Hours of Operation (hours/year)] x [1 MMCF / 1000 MMBtu]

Uncontrolled Potential to Emit (tons/yr) = Maximum Grain Throughput (tons/year) * Emission Factor (lb/ton) * 1 ton/2000 lbs

Uncontrolled Potential to Emit from Grain Dryer (tons/yr) = Dryer Maximum Fuel Usage (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

Assumptions made when calculating PTE:

50% of all grain is received by straight truck.

All grain received was cleaned.

All grain received was dried.

All grain received was shipped out by truck.

**Appendix A: Emissions Calculations
Grain Handling and Drying
Potential Emissions With Controls**

Company Name: ADM Grain Company
Location: 105 East Harrison, Attica, IN 47918
Permit No: F045-29376-00016
Permit Reviewer: Summer Keown
Date: August 16, 2010

Maximum Annual Grain Throughput (bushels/year)	Maximum Annual Grain Throughput (tons/year)	Dryer Maximum Heat Input Capacity (MMBtu/hr)	Dryer Maximum Hours of Operation (hours/year)	Dryer Maximum Fuel Usage Rate (MMCF/year)
30,000,000	900,000	91.8	8760	804.17

Process/Activity	Maximum Annual Grain Throughput (tons/year)	AP-42 Emission Factor (lb/ton)*			Controls	Control Efficiencies	Controlled Potential to Emit (tons/year)						
		PM	PM10	PM2.5			PM	PM10	PM2.5	NOx	SO2	CO	VOC
Receiving by Straight Truck	450,000	0.180	0.059	0.010	none	0%	40.50	13.28	2.25	0.0	0.0	0.0	0.0
Receiving by Hopper Truck	450,000	0.035	0.0078	0.0013	none	0%	7.88	1.76	0.29	0.0	0.0	0.0	0.0
Internal Handling	1,800,000	0.061	0.034	0.0058	Enclosure	90%	5.49	3.06	0.52	0.0	0.0	0.0	0.0
Cleaning	900,000	0.075	0.019	0.0032	Enclosure	90%	3.38	0.86	0.14	0.0	0.0	0.0	0.0
Grain Drying	900,000	0.220	0.055	0.0094	none	0%	99.00	24.75	4.23	0.0	0.0	0.0	0.0
Grain Dryer Fuel Combustion	---	See Below			none	0%	0.76	3.06	3.06	40.21	0.24	33.78	2.21
Shipping by Truck (worst case)	900,000	0.086	0.029	0.0049	Socks / Sleeves	90%	3.87	1.31	0.22	0.0	0.0	0.0	0.0
Storage Bin Vents	900,000	0.025	0.0063	0.0011	none	0%	11.25	2.84	0.50	0.0	0.0	0.0	0.0
Totals							172.12	50.89	11.21	40.21	0.24	33.78	2.21

Process/Activity	AP-42 Emission Factor (lb/MMCF)**						
	PM	PM10	PM2.5	CO	NOx	SO2	VOC
Grain Dryer Fuel Combustion	1.9	7.6	7.6	84.0	100	0.6	5.5

Methodology

* AP-42 Factors are from Table 9.9.1-1. Particulate Emission Factors for Grain Elevators

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

Dryer Maximum Fuel Usage Rate (MMCF/year) = [Maximum Heat Input Capacity (MMBtu/hr)] x [Maximum Hours of Operation (hours/year)] x [1 MMCF / 1000 MMBtu]

Uncontrolled Potential to Emit (tons/yr) = Maximum Grain Throughput (tons/year) * Emission Factor (lb/ton) * 1 ton/2000 lbs

Uncontrolled Potential to Emit from Grain Dryer (tons/yr) = Dryer Maximum Fuel Usage (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

Controlled Potential to Emit (tons/yr) = Maximum Grain Throughput (tons/yr) * Emission Factor (lb/ton) * 1 ton/2000 lbs * (1 - Control Efficiency)

Assumptions made when calculating PTE:

50% of all grain is received by Straight Truck.

All grain received was cleaned.

All grain received was dried.

All grain received was shipped out by truck.

Appendix A: Emissions Calculations

**Grain Elevator
Fugitive Dust from Unpaved Roads**

Company Name: ADM Grain Company
Location: 105 East Harrison, Attica, IN 47918
Permit No: F045-29376-00016
Permit Reviewer: Summer Keown
Date: August 16, 2010

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 13.2.2.2.

Road Calculation Assumptions

Throughput 900,000 tons per year
 103 tons per hour

Heavy Duty Diesel 25 tons per truck
 4 trucks per hour

Light Duty car/truck 1 yard truck
 1 trip per hour

All employees access parking lots via a public road and do not drive on the facility road.

Facility roads are treated with Soapstock therefore, 50% control efficiency is claimed.

I. Heavy Duty Diesel

4 trip/hr x
 0.5 mile/trip x
 2 (round trip) x
 8,760 hr/yr = 35040 miles per year

$$E_f = k \cdot [(s/12)^{0.8}] \cdot [(W/3)^b] / [(M/0.2)^c] \cdot [(365-p)/365] \cdot (S/15)$$

= 1.54 lb PM-10/mile
 = 7.69 lb PM/mile

where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
 s = 4.8 mean % silt content of unpaved roads
 b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
 c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
 W = 40 tons average vehicle weight
 M = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)
 S = 10.0 mph speed limit
 p = 125.0 number of days with at least 0.01 in. of precipitation per year

PM-10:	1.54 lb/mi x	35040 mi/yr x	50%	13.52 tons/yr
	2000 lb/ton		Control	

PM:	7.69 lb/mi x	35040 mi/yr x	50%	67.37 tons/yr
	2000 lb/ton		Control	

II. Light Duty gas car/truck used by employees

2 trip/hr x
 0.5 mile/trip x
 2 (round trip) x
 8,760 hr/yr = 17520 miles per year

$$E_f = k \cdot [(s/12)^{0.8}] \cdot [(W/3)^b] / [(M/0.2)^c] \cdot [(365-p)/365] \cdot (S/15)$$

= 0.47 lb PM-10/mile
 = 1.72 lb PM/mile

where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
 s = 4.8 mean % silt content of unpaved roads
 b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
 c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
 W = 2 tons average vehicle weight
 M = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)
 S = 10.0 mph speed limit
 p = 125.0 number of days with at least 0.01 in. of precipitation per year

PM-10:	0.47 lb/mi x	17520 mi/yr x	50%	2.04 tons/yr
	2000 lb/ton		Control	

PM:	1.72 lb/mi x	17520 mi/yr x	50%	7.53 tons/yr
	2000 lb/ton		Control	

Total PM Emissions From Unpaved Roads = 74.90 tons/yr

Total PM-10/PM-2.5 Emissions From Unpaved Roads = 15.56 tons/yr



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

Sept. 24, 2010

Matt Coulter
ADM Grain Company
105 E. Harrison
Attica IN 47918

Re: Public Notice
ADM Grain Company
Permit Level: FESOP
Permit Number: 045-29376-00016

Dear Mr. Coulter;

Enclosed is a copy of your draft FESOP, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Attica Public Library, 304 S. Perry in Attica IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Fountain County Neighbor in Attica IN publish this notice no later than Mon. Oct. 4, 2010.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Summer Keown, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5175 or dial (317) 234-5175

Sincerely,

Bonnie Miller

Bonnie Miller
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter. dot 3/27/08



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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

Sept. 24, 2010

Fountain County Neighbor
Nancy
113 S. Perry St.
Attica IN 47918

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for ADM Grain Company, Fountain, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than Mon. Oct. 4, 2010.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Bonnie Miller at 800-451-6027 and ask for extension 2-0286 or dial 317-232-0286.

Sincerely,

Bonnie Miller
Bonnie Miller
Permit Branch
Office of Air Quality

cc: Tami DeMott: OAQ Billing, Licensing and Training Section
Permit Level: FESOP
Permit Number: 045-29376-00016

Enclosure
PN Newspaper.dot 3/27/08



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Sept. 24, 2010

To: Attica Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: ADM Grain Company
Permit Number: 045-29376-00016

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 03/27/08



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Notice of Public Comment

Sept. 24, 2010
ADM Grain Company
045-29376-00016

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 2-8469 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 3/27/08

Mail Code 61-53

IDEM Staff	BMILLER 9/24/2010 ADM Grain Company 045-29376-00016 (draft)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Matt Coulter ADM Grain Company 105 E Harrison Attica IN 47918 (Source CAATS)									
2		Jeffrey J Becker VP of US Grain Ops ADM Grain Company 4666 Faries Pkwy Decatur IL 62525 (RO CAATS)									
3		Fountain-Warren County Health Department 210 S. Perry St Attica IN 47918-1352 (Health Department)									
4		Attica Public Library 304 S Perry Attica IN 47918-1494 (Library)									
5		Fountain County Commissioners 301 Fourth Street Covington IN 47932 (Local Official)									
6		Mr. Robert Kelley 2555 S 30th Street Lafayette IN 44909 (Affected Party)									
7		Attica City Council and Mayors Office 305 E Main Street Attica IN 47918 (Local Official)									
8		Beth York Archer Daniels Midland Company 4666 Faries Pkwy Decatur IL 62526 (Consultant)									
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