



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 2, 2011

RE: ADM Grain / 153-30433-00002

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

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07



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- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
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Miranda Gerard
ADM Grain Company
4666 Faries Parkway
Decatur, Illinois 62525

September 2, 2011

Re: 153-30433-00002
Second Notice-Only Change to
M153-23403-00002

Dear Ms. Gerard:

ADM Grain Company (ADM) was issued a Minor Source Operating Permit (MSOP) No. M153-23403-00002 on April 5, 2007, for a stationary grain elevator located at 323 North Holloway, Sullivan, Indiana 47882. On April 11, 2011, the Office of Air Quality (OAQ) received an application from the source requesting approval to construct and operate two new grain bins, conveying equipment, and a new truck shipping area that is of the same type as the other permitted grain bins, conveying equipment, and truck shipping area at the source. In addition, the source requested that permit be revised to clarify that the North Truck Receiving Pit and South Truck Receiving Pit have associated drag conveyors and bin fill conveyors, which were inadvertently not included in the original application for MSOP No. M153-23403-00002. The additional equipment will not alter the source's potential to emit because the potential annual grain throughput will remain the same. The new and existing equipment being added to the permit will comply with the same applicable requirements and permit terms and conditions as the other similar equipment, but will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3 (see attached updated potential to emit calculations). The uncontrolled/unlimited potential to emit of the entire source will continue to be less than the threshold levels specified in 326 IAC 2-7. The addition of this equipment to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(13).

IDEM, OAQ has decided to make the following additional revisions to the permit:

1. The emission unit descriptions in Sections A.2 and D.1 for the stand alone hooded baghouse have been revised to indicate that it is identified as Baghouse 1.
2. The emission unit descriptions in Sections A.2 and D.1 for the grain dryer have been revised to indicate that it is a natural gas-fired grain dryer.
3. The Semi-Annual Natural Gas Fired Boiler Certification form has been removed from the permit, since the natural gas-fired grain dryer is only capable of burning natural gas.
4. The Fugitive Particulate Matter Emission Control Plan is now included in the permit as Attachment A. The plan has been updated to include the two new grain bins.

Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby revised as follows with the deleted language as ~~strikeouts~~ and new language **bolded**.

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) truck receiving operation, identified as EP-1, consisting of the following

equipment:

...

(3) One (1) truck receiving pit, identified as East Truck Receiving Pit with a maximum receiving throughput of 400 bushels per hour, a maximum transfer throughput of 3,000 bushels per hour, and constructed prior to 1996 and equipped with stand alone hooded baghouse (**Baghouse 1**) for particulate control.

(b) One (1) enclosed internal grain handling operation, identified as EP-2, with a maximum throughput of 18,000,000 bushels per year, consisting of the following equipment:

...

(10) One (1) reclaim conveyor identified as 22 Reclaim, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour.

(11) One (1) reclaim conveyor identified as 23 Reclaim, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour.

(12) One (1) reclaim conveyor to leg, identified as 22/23 Reclaim, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour.

~~(13)~~ One (1) reclaim conveyor identified as 6/7/8 Reclaim Drag, constructed prior to 1996, with a maximum throughput of 25,000 bushels per hour.

(14) Two (2) reclaim drags identified as 17/18, 19/20 Reclaim Drags, constructed prior to 1996, each with a maximum throughput of 3,000 bushels per hour.

(15) One (1) fill drag identified as 19/20 Fill Drag, constructed prior to 1996, with a maximum throughput of 3,000 bushels per hour.

~~(16)~~ One (1) bin fill conveyor, identified as 21 Fill, constructed in 1999, with a maximum throughput of 20,000 bushels per hour.

(17) One (1) bin fill conveyor, identified as 22 Fill, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.

(18) One (1) bin fill conveyor, identified as 23 Fill, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.

(19) One (1) bin fill conveyor, identified as East Pit Drag, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.

(20) One (1) bin fill conveyor, identified North Pit Drag, constructed in 2004, with a maximum throughput of 4,500 bushels per hour.

(21) One (1) bin fill conveyor, identified South Pit Drag, constructed prior to 1996, with a maximum throughput of 10,000 bushels per hour.

- (22) **One (1) bin fill conveyor, identified as East Leg, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.**
- (4223) One (1) rail Hi Roller constructed in 2005 with a maximum throughput of 35,000 bushels per hour.
- (c) One (1) truck shipping (rail loadout) area, identified as EP-3, with a maximum throughput of 40,000 bushels per hour, constructed in 2005, and equipped with socks/sleeves and stand alone hooded baghouse (**Baghouse 1**) for particulate control.
- (d) One (1) rail shipping area, identified as EP-4, with a maximum throughput of 35,000 bushels per hour. The shipping area was constructed in 2005 and equipped with a fixed spout and stand alone hooded baghouse (**Baghouse 1**) to control fugitive dust.
- (e) **One (1) truck shipping area, identified as EP-5, with a maximum throughput of 3,000 bushels per hour, approved for construction in 2011, and equipped with socks/sleeves.**
- (ef) Sixteen ~~Eighteen~~ (4618) storage bins, each with a vent, consisting of the following bins:
...
 - (11) **One (1) storage bin, identified as bin 22, approved for construction in 2011, with a maximum capacity of 213,844 bushels.**
 - (12) **One (1) storage bin, identified as bin 23, approved for construction in 2011, with a maximum capacity of 213,844 bushels.**
- (fg) Unpaved haul roads, identified as EP-06, using oil cover for dust suppression, and paved haul roads identified as EP-08.
- (gh) One (1) **natural gas-fired** grain dryer, identified as EP-07, constructed prior to 1996, with a maximum heat input capacity of 14 MMBtu per hour, and a maximum throughput of 4,000 bushels per hour.
- (hi) One (1) asphalt base open aggregate pile equipped with a storage ring, constructed in 2005 and modified in 2010, with a maximum capacity of 488,231 bushels.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) truck receiving operation, identified as EP-1, consisting of the following equipment:
...
 - (3) One (1) truck receiving pit, identified as East Truck Receiving Pit with a maximum receiving throughput of 400 bushels per hour, a maximum transfer throughput of 3,000 bushels per hour, and constructed prior to 1996 and equipped with stand alone hooded baghouse (**Baghouse 1**) for particulate control.
- (b) One (1) enclosed internal grain handling operation, identified as EP-2, with a maximum throughput of 1845,000,000 bushels per year, consisting of the following equipment:
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- (11) One (1) reclaim conveyor identified as 23 Reclaim, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour.
- (12) One (1) reclaim conveyor to leg, identified as 22/23 Reclaim, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour.
- (4013) One (1) reclaim conveyor identified as 6/7/8 Reclaim Drag, constructed prior to 1996, with a maximum throughput of 25,000 bushels per hour.
- (14) Two (2) reclaim drags identified as 17/18, 19/20 Reclaim Drags, constructed prior to 1996, each with a maximum throughput of 3,000 bushels per hour.
- (15) One (1) fill drag identified as 19/20 Fill Drag, constructed prior to 1996, with a maximum throughput of 3,000 bushels per hour.
- (4416) One (1) bin fill conveyor, identified as 21 Fill, constructed in 1999, with a maximum throughput of 20,000 bushels per hour.
- (17) One (1) bin fill conveyor, identified as 22 Fill, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.
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- (19) One (1) bin fill conveyor, identified as East Pit Drag, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.
- (20) One (1) bin fill conveyor, identified North Pit Drag, constructed in 2004, with a maximum throughput of 4,500 bushels per hour.
- (21) One (1) bin fill conveyor, identified South Pit Drag, constructed prior to 1996, with a maximum throughput of 10,000 bushels per hour.
- (22) One (1) bin fill conveyor, identified as East Leg, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.
- (4223) One (1) rail Hi Roller constructed in 2005 with a maximum throughput of 35,000 bushels per hour.
- (c) One (1) truck shipping (rail loadout) area, identified as EP-3, with a maximum throughput of 40,000 bushels per hour, constructed in 2005, and equipped with socks/sleeves and stand alone hooded baghouse (**Baghouse 1**) for particulate control.
- (d) One (1) rail shipping area, identified as EP-4, with a maximum throughput of 35,000 bushels per hour. The shipping area was constructed in 2005 and equipped with a fixed spout and stand alone hooded baghouse (**Baghouse 1**) to control fugitive dust.

- (e) **One (1) truck shipping area, identified as EP-5, with a maximum throughput of 3,000 bushels per hour, approved for construction in 2011, and equipped with socks/sleeves.**
- (ef) Sixteen ~~Eighteen~~ (4618) storage bins, each with a vent, consisting of the following bins:
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 - (12) **One (1) storage bin, identified as bin 23, approved for construction in 2011, with a maximum capacity of 213,844 bushels.**
- (fg) Unpaved haul roads, identified as EP-06, using oil cover for dust suppression, and paved haul roads identified as EP-08.
- (gh) One (1) **natural gas-fired** grain dryer, identified as EP-07, constructed prior to 1996, with a maximum heat input capacity of 14 MMBtu per hour, and a maximum throughput of 4,000 bushels per hour.
- (hi) One (1) asphalt base open aggregate pile equipped with a storage ring, constructed in 2005 and modified in 2010, with a maximum capacity of 488,231 bushels.
 ...

D.1.1 Particulate [326 IAC 6-3-2]

The following table shows the maximum process weight rate and allowable particulate emission rate for each emission unit:

| Emission Unit | Process Weight Throughput (tons/hr) | Particulate Emission Limit (lbs/hr) |
|------------------------|-------------------------------------|-------------------------------------|
| N. Truck Receiving Pit | 7.50 | 15.8 |
| S. Truck Receiving Pit | 25.5 | 35.9 |
| E. Truck Receiving Pit | 12.0 | 21.7 |
| 12 Drag | 225 | 59.8 |
| Ground Pile Drag | 255 | 61.2 |
| Transfer Drag | 150 | 55.4 |
| Dryer Drag | 120 | 53.1 |
| 12/13 Belt | 225 | 59.8 |
| 13/14 Belt | 225 | 59.8 |
| 14/15 Belt | 225 | 59.8 |
| 15/16 Belt | 225 | 59.8 |
| 30 Belt | 300 | 63.0 |
| East OH Belt | 300 | 63.0 |
| 14/15/16 Reclaim | 270 | 61.8 |
| 21 Reclaim | 600 | 71.2 |
| 22 Reclaim | 600 | 71.2 |
| 23 Reclaim | 600 | 71.2 |
| 22/23 Reclaim | 600 | 71.2 |

| | | |
|------------------------------|------------|--------------|
| 6/7/8 Reclaim Drag | 750 | 73.9 |
| 17/18 Reclaim Drag | 90 | 50.2 |
| 19/20 Reclaim Drag | 90 | 50.2 |
| 19/20 Fill Drag | 90 | 50.2 |
| 21 Fill | 600 | 71.2 |
| 22 Fill | 600 | 71.2 |
| 23 Fill | 600 | 71.2 |
| East Pit Drag | 600 | 71.2 |
| North Pit Drag | 135 | 109.7 |
| South Pit Drag | 300 | 187.3 |
| East Leg | 600 | 71.2 |
| Rail High Roller | 1,050 | 78.2 |
| Truck Shipping (EP-3) | 1,200 | 80.0 |
| Rail Shipping (EP-4) | 1,050 | 78.2 |
| Truck Shipping (EP-5) | 90 | 50.2 |

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the truck shipping and rail shipping areas, identified as EP-3, and EP-4, and EP-5, and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: _____ ADM Grain Company
 Source Address: _____ 323 North Holloway, Sullivan, Indiana 47882
 MSOP Permit No.: _____ 153-23403-00002

| |
|--|
| <input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned From: _____ To: _____ |
|--|

| |
|---|
| 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: _____ |
| Phone: _____ |
| Date: _____ |

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nathan C. Bell, of my staff, at 317-233-5670 or 1-800-451-6027, and ask for extension 3-5670

Sincerely,



Alfred C. Dumauel, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit
Updated Calculations

ACD/ncb

cc: File - Sullivan County
Sullivan County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section



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Minor Source Operating Permit OFFICE OF AIR QUALITY

**ADM Grain Company
323 North Holloway
Sullivan, Indiana 47882**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

| | |
|---|--|
| Operation Permit No.: 153-23403-00002 | |
| Original Signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality | Issuance Date: April 5, 2007 Expiration Date: April 5, 2012 |

First Notice Only Change No. 153-29884-00002, issued January 18, 2011

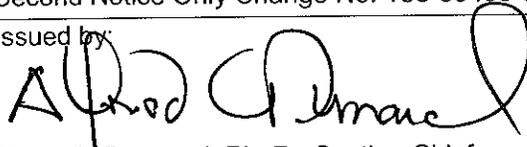
| | |
|---|--|
| Second Notice Only Change No. 153-30433-00002 | |
| Issued by:  Alfred C. Dumaul, Ph. D., Section Chief Permits Branch Office of Air Quality | Issuance Date: September 2, 2011 Expiration Date: April 5, 2012 |

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[IC 13-14-1-13]

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Attachment A: Fugitive Particulate Matter Emission Control Plan

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary country grain elevator.

| | |
|------------------------------|--|
| Source Address: | 323 North Holloway, Sullivan, Indiana 47882 |
| General Source Phone Number: | (217) 424-5817 |
| SIC Code: | 5153 |
| County Location: | Sullivan |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Minor Source Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories |

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) truck receiving operation, identified as EP-1, consisting of the following equipment:
 - (1) One (1) truck receiving pit, identified as North Truck Receiving Pit with a maximum receiving throughput of 250 bushels per hour, a maximum transfer throughput of 4,500 bushels per hour, and constructed in 2004.
 - (2) One (1) truck receiving pit, identified as South Truck Receiving Pit with a maximum receiving throughput of 850 bushels per hour, a maximum transfer throughput of 10,000 bushels per hour, and constructed prior to 1996.
 - (3) One (1) truck receiving pit, identified as East Truck Receiving Pit with a maximum receiving throughput of 400 bushels per hour, a maximum transfer throughput of 3,000 bushels per hour, and constructed prior to 1996 and equipped with stand alone hooded baghouse (Baghouse 1) for particulate control.
- (b) One (1) enclosed internal grain handling operation, identified as EP-2, with a maximum throughput of 18,000,000 bushels per year, consisting of the following equipment:
 - (1) One (1) drag conveyor identified as 12 Drag, constructed prior to 1996, with a maximum throughput of 7,500 bushels per hour.
 - (2) One (1) Hi Roller conveyor identified as Ground Pile Drag, constructed in 2005, with a maximum throughput of 8,500 bushels per hour.
 - (3) One (1) drag conveyor identified as Transfer Drag, constructed prior to 1996, with a maximum throughput of 5,000 bushels per hour.
 - (4) One (1) drag conveyor identified as Dryer Drag, constructed prior to 1996, with a maximum throughput of 4,000 bushels per hour.

- (5) Four (4) belt conveyors identified as Belts: 12/13, 13/14, 14/15, and 15/16, constructed prior to 1996. The maximum throughput of each conveyor unit is 7,500 bushels per hour.
- (6) One (1) enclosed drag conveyor identified as Belt 30, constructed in 1996 and modified in 2010, with a maximum throughput of 10,000 bushels per hour.
- (7) One (1) enclosed Hi Roller conveyor identified as East OH, constructed in 1996 and modified in 2010, with a maximum throughput of 10,000 bushels per hour.
- (8) One (1) reclaim conveyor identified as 14/15/16 Reclaim, constructed prior to 1996, with a maximum throughput of 17,000 bushels per hour.
- (9) One (1) reclaim conveyor identified as 21 Reclaim, constructed in 1999, with a maximum throughput of 20,000 bushels per hour.
- (10) One (1) reclaim conveyor identified as 22 Reclaim, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour.
- (11) One (1) reclaim conveyor identified as 23 Reclaim, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour.
- (12) One (1) reclaim conveyor to leg, identified as 22/23 Reclaim, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour.
- (13) One (1) reclaim conveyor identified as 6/7/8 Reclaim Drag, constructed prior to 1996, with a maximum throughput of 25,000 bushels per hour.
- (14) Two (2) reclaim drags identified as 17/18, 19/20 Reclaim Drags, constructed prior to 1996, each with a maximum throughput of 3,000 bushels per hour.
- (15) One (1) fill drag identified as 19/20 Fill Drag, constructed prior to 1996, with a maximum throughput of 3,000 bushels per hour.
- (16) One (1) bin fill conveyor, identified as 21 Fill, constructed in 1999, with a maximum throughput of 20,000 bushels per hour.
- (17) One (1) bin fill conveyor, identified as 22 Fill, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.
- (18) One (1) bin fill conveyor, identified as 23 Fill, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.
- (19) One (1) bin fill conveyor, identified as East Pit Drag, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.
- (20) One (1) bin fill conveyor, identified North Pit Drag, constructed in 2004, with a maximum throughput of 4,500 bushels per hour.
- (21) One (1) bin fill conveyor, identified South Pit Drag, constructed prior to 1996, with a maximum throughput of 10,000 bushels per hour.

- (22) One (1) bin fill conveyor, identified as East Leg, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.
- (23) One (1) rail Hi Roller constructed in 2005 with a maximum throughput of 35,000 bushels per hour.
- (c) One (1) truck shipping (rail loadout) area, identified as EP-3, with a maximum throughput of 40,000 bushels per hour, constructed in 2005, and equipped with socks/sleeves and stand alone hooded baghouse (Baghouse 1) for particulate control.
- (d) One (1) rail shipping area, identified as EP-4, with a maximum throughput of 35,000 bushels per hour. The shipping area was constructed in 2005 and equipped with a fixed spout and stand alone hooded baghouse (Baghouse 1) to control fugitive dust.
- (e) One (1) truck shipping area, identified as EP-5, with a maximum throughput of 3,000 bushels per hour, approved for construction in 2011, and equipped with socks/sleeves.
- (f) Eighteen (18) storage bins, each with a vent, consisting of the following bins:
 - (1) One (1) storage bin, identified as bin 6, constructed prior to 1996, with a maximum capacity of 199,579 bushels.
 - (2) One (1) storage bin, identified as bin 7, constructed in 1996, with a maximum capacity of 105,940 bushels.
 - (3) One (1) storage bin, identified as bin 8, constructed prior to 1996, with a maximum capacity of 106,682 bushels.
 - (4) Four (4) storage bins, identified as bins 9, 10, 11, and 12, each constructed prior to 1996, and each with a maximum capacity of 25,223 bushels.
 - (5) One (1) storage bin, identified as bin 13, constructed prior to 1996, with a maximum capacity of 103,709 bushels.
 - (6) One (1) storage bin, identified as bin 14, constructed prior to 1996, with a maximum capacity of 200,434 bushels.
 - (7) Two (2) storage bins, identified as bins 15 and 16, each constructed prior to 1996, and each with a maximum capacity of 200,978 bushels.
 - (8) Two (2) storage bins, identified as bins 17 and 18, each constructed prior to 1996, and each with a maximum capacity of 15,526 bushels.
 - (9) Two (2) storage bins, identified as bins 19 and 20, each constructed prior to 1996, and each with a maximum capacity of 23,795 bushels.
 - (10) One (1) storage bin, identified as bin 21, constructed in 1999, with a maximum capacity of 434,834 bushels.
 - (11) One (1) storage bin, identified as bin 22, approved for construction in 2011, with a maximum capacity of 213,844 bushels.
 - (12) One (1) storage bin, identified as bin 23, approved for construction in 2011, with a maximum capacity of 213,844 bushels.

- (g) Unpaved haul roads, identified as EP-06, using oil cover for dust suppression, and paved haul roads identified as EP-08.
- (h) One (1) natural gas-fired grain dryer, identified as EP-07, constructed prior to 1996, with a maximum heat input capacity of 14 MMBtu per hour, and a maximum throughput of 4,000 bushels per hour.
- (i) One (1) asphalt base open aggregate pile equipped with a storage ring, constructed in 2005 and modified in 2010, with a maximum capacity of 488,231 bushels.

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M153-23403-00002, 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

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

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

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

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (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 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.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 153-23403-00002 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.12 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

C.8 Stack Height [326 IAC 1-7]

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

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

C.10 Performance Testing [326 IAC 3-6]

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.12 Compliance Monitoring [326 IAC 2-1.1-11]

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

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

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

Corrective Actions and Response Steps

C.14 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ

that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

C.16 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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

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

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

- (c) 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.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) truck receiving operation, identified as EP-1, consisting of the following equipment:
 - (1) One (1) truck receiving pit, identified as North Truck Receiving Pit with a maximum receiving throughput of 250 bushels per hour, a maximum transfer throughput of 4,500 bushels per hour, and constructed in 2004.
 - (2) One (1) truck receiving pit, identified as South Truck Receiving Pit with a maximum receiving throughput of 850 bushels per hour, a maximum transfer throughput of 10,000 bushels per hour, and constructed prior to 1996.
 - (3) One (1) truck receiving pit, identified as East Truck Receiving Pit with a maximum receiving throughput of 400 bushels per hour, a maximum transfer throughput of 3,000 bushels per hour, and constructed prior to 1996 and equipped with stand alone hooded baghouse (Baghouse 1) for particulate control.

- (b) One (1) enclosed internal grain handling operation, identified as EP-2, with a maximum throughput of 18,000,000 bushels per year, consisting of the following equipment:
 - (1) One (1) drag conveyor identified as 12 Drag, constructed prior to 1996, with a maximum throughput of 7,500 bushels per hour.
 - (2) One (1) Hi Roller conveyor identified as Ground Pile Drag, constructed in 2005, with a maximum throughput of 8,500 bushels per hour.
 - (3) One (1) drag conveyor identified as Transfer Drag, constructed prior to 1996, with a maximum throughput of 5,000 bushels per hour.
 - (4) One (1) drag conveyor identified as Dryer Drag, constructed prior to 1996, with a maximum throughput of 4,000 bushels per hour.
 - (5) Four (4) belt conveyors identified as Belts: 12/13, 13/14, 14/15, and 15/16, constructed prior to 1996. The maximum throughput of each conveyor unit is 7,500 bushels per hour.
 - (6) One (1) enclosed drag conveyor identified as Belt 30, constructed in 1996 and modified in 2010, with a maximum throughput of 10,000 bushels per hour.
 - (7) One (1) enclosed Hi Roller conveyor identified as East OH, constructed in 1996 and modified in 2010, with a maximum throughput of 10,000 bushels per hour.
 - (8) One (1) reclaim conveyor identified as 14/15/16 Reclaim, constructed prior to 1996, with a maximum throughput of 17,000 bushels per hour.
 - (9) One (1) reclaim conveyor identified as 21 Reclaim, constructed in 1999, with a maximum throughput of 20,000 bushels per hour.
 - (10) One (1) reclaim conveyor identified as 22 Reclaim, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour.

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

Emissions Unit Description (continued):

- (11) One (1) reclaim conveyor identified as 23 Reclaim, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour.
 - (12) One (1) reclaim conveyor to leg, identified as 22/23 Reclaim, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour.
 - (13) One (1) reclaim conveyor identified as 6/7/8 Reclaim Drag, constructed prior to 1996, with a maximum throughput of 25,000 bushels per hour.
 - (14) Two (2) reclaim drags identified as 17/18, 19/20 Reclaim Drags, constructed prior to 1996, each with a maximum throughput of 3,000 bushels per hour.
 - (15) One (1) fill drag identified as 19/20 Fill Drag, constructed prior to 1996, with a maximum throughput of 3,000 bushels per hour.
 - (16) One (1) bin fill conveyor, identified as 21 Fill, constructed in 1999, with a maximum throughput of 20,000 bushels per hour.
 - (17) One (1) bin fill conveyor, identified as 22 Fill, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.
 - (18) One (1) bin fill conveyor, identified as 23 Fill, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.
 - (19) One (1) bin fill conveyor, identified as East Pit Drag, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.
 - (20) One (1) bin fill conveyor, identified North Pit Drag, constructed in 2004, with a maximum throughput of 4,500 bushels per hour.
 - (21) One (1) bin fill conveyor, identified South Pit Drag, constructed prior to 1996, with a maximum throughput of 10,000 bushels per hour.
 - (22) One (1) bin fill conveyor, identified as East Leg, approved for construction in 2011, with a maximum throughput of 20,000 bushels per hour, exhausting to Baghouse 1 for particulate control.
 - (23) One (1) rail Hi Roller constructed in 2005 with a maximum throughput of 35,000 bushels per hour.
- (c) One (1) truck shipping (rail loadout) area, identified as EP-3, with a maximum throughput of 40,000 bushels per hour, constructed in 2005, and equipped with socks/sleeves and stand alone hooded baghouse (Baghouse 1) for particulate control.
- (d) One (1) rail shipping area, identified as EP-4, with a maximum throughput of 35,000 bushels per hour. The shipping area was constructed in 2005 and equipped with a fixed spout and stand alone hooded baghouse (Baghouse 1) to control fugitive dust.

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

Emissions Unit Description (continued):

- (e) One (1) truck shipping area, identified as EP-5, with a maximum throughput of 3,000 bushels per hour, approved for construction in 2011, and equipped with socks/sleeves.
- (f) Eighteen (18) storage bins, each with a vent, consisting of the following bins:
 - (1) One (1) storage bin, identified as bin 6, constructed prior to 1996, with a maximum capacity of 199,579 bushels.
 - (2) One (1) storage bin, identified as bin 7, constructed in 1996, with a maximum capacity of 105,940 bushels.
 - (3) One (1) storage bin, identified as bin 8, constructed prior to 1996, with a maximum capacity of 106,682 bushels.
 - (4) Four (4) storage bins, identified as bins 9, 10, 11, and 12, each constructed prior to 1996, and each with a maximum capacity of 25,223 bushels.
 - (5) One (1) storage bin, identified as bin 13, constructed prior to 1996, with a maximum capacity of 103,709 bushels.
 - (6) One (1) storage bin, identified as bin 14, constructed prior to 1996, with a maximum capacity of 200,434 bushels.
 - (7) Two (2) storage bins, identified as bins 15 and 16, each constructed prior to 1996, and each with a maximum capacity of 200,978 bushels.
 - (8) Two (2) storage bins, identified as bins 17 and 18, each constructed prior to 1996, and each with a maximum capacity of 15,526 bushels.
 - (9) Two (2) storage bins, identified as bins 19 and 20, each constructed prior to 1996, and each with a maximum capacity of 23,795 bushels.
 - (10) One (1) storage bin, identified as bin 21, constructed in 1999, with a maximum capacity of 434,834 bushels.
 - (11) One (1) storage bin, identified as bin 22, approved for construction in 2011, with a maximum capacity of 213,844 bushels.
 - (12) One (1) storage bin, identified as bin 23, approved for construction in 2011, with a maximum capacity of 213,844 bushels.
- (g) Unpaved haul roads, identified as EP-06, using oil cover for dust suppression, and paved haul roads identified as EP-08.
- (h) One (1) natural gas-fired grain dryer, identified as EP-07, constructed prior to 1996, with a maximum heat input capacity of 14 MMBtu per hour, and a maximum throughput of 4,000 bushels per hour.
- (i) One (1) asphalt base open aggregate pile equipped with a storage ring, constructed in 2005 and modified in 2010, with a maximum capacity of 488,231 bushels.

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

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

D.1.1 Particulate [326 IAC 6-3-2]

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

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and } P = \text{process weight rate in tons per hour}$$

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:

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

The following table shows the maximum process weight rate and allowable particulate emission rate for each emission unit:

| Emission Unit | Process Weight Throughput (tons/hr) | Particulate Emission Limit (lbs/hr) |
|------------------------|-------------------------------------|-------------------------------------|
| N. Truck Receiving Pit | 7.50 | 15.8 |
| S. Truck Receiving Pit | 25.5 | 35.9 |
| E. Truck Receiving Pit | 12.0 | 21.7 |
| 12 Drag | 225 | 59.8 |
| Ground Pile Drag | 255 | 61.2 |
| Transfer Drag | 150 | 55.4 |
| Dryer Drag | 120 | 53.1 |
| 12/13 Belt | 225 | 59.8 |
| 13/14 Belt | 225 | 59.8 |
| 14/15 Belt | 225 | 59.8 |
| 15/16 Belt | 225 | 59.8 |
| 30 Belt | 300 | 63.0 |
| East OH Belt | 300 | 63.0 |
| 14/15/16 Reclaim | 270 | 61.8 |
| 21 Reclaim | 600 | 71.2 |
| 22 Reclaim | 600 | 71.2 |
| 23 Reclaim | 600 | 71.2 |
| 22/23 Reclaim | 600 | 71.2 |
| 6/7/8 Reclaim Drag | 750 | 73.9 |
| 17/18 Reclaim Drag | 90 | 50.2 |
| 19/20 Reclaim Drag | 90 | 50.2 |
| 19/20 Fill Drag | 90 | 50.2 |
| 21 Fill | 600 | 71.2 |
| 22 Fill | 600 | 71.2 |
| 23 Fill | 600 | 71.2 |
| East Pit Drag | 600 | 71.2 |

| Emission Unit | Process Weight Throughput (tons/hr) | Particulate Emission Limit (lbs/hr) |
|-----------------------|-------------------------------------|-------------------------------------|
| North Pit Drag | 135 | 109.7 |
| South Pit Drag | 300 | 187.3 |
| East Leg | 600 | 71.2 |
| Rail High Roller | 1,050 | 78.2 |
| Truck Shipping (EP-3) | 1,200 | 80.0 |
| Rail Shipping (EP-4) | 1,050 | 78.2 |
| Truck Shipping (EP-5) | 90 | 50.2 |

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

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the truck shipping and rail shipping areas, identified as EP-3, EP-4, and EP-5, and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the socks and sleeves shall be in operation and control particulate emissions from the truck and rail shipping areas at all times these facilities are in operation.

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

D.1.4 Monitoring

To monitor the performance of the socks and sleeves, the Permittee shall perform weekly inspections of the socks and sleeves to verify the placement and configuration meet recommendations of the manufacturer. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.5 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain a log of weekly inspections of the socks and sleeves.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

| | |
|----------------------|-------------------------|
| Company Name: | ADM Grain Company |
| Address: | 323 North Holloway |
| City: | Sullivan, Indiana 47882 |
| Phone #: | 815-539-7491 |
| MSOP #: | 153-23403-00002 |

I hereby certify that ADM Grain Company is :

still in operation.

no longer in operation.

I hereby certify that ADM Grain Company is :

in compliance with the requirements of MSOP 153-23403-00002.

not in compliance with the requirements of MSOP 153-23403-00002.

| |
|---------------------------------------|
| Authorized Individual (typed): |
| Title: |
| Signature: |
| Date: |

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

| |
|-----------------------|
| Noncompliance: |
| |
| |
| |
| |

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES ? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Attachment A
to MSOP No. M153-23403-00002

Fugitive Particulate Matter Emission Control Plan

ADM

Fugitive Particulate Matter Emission Control Plan

1. **Name and Address of the source:** ADM Grain Company - Sullivan 323 North Holloway
Sullivan, IN 47882
2. **Name and address of the owner or operator responsible for the execution of the control plan.**
Same as above
3. **Identification of all processes, operation, and areas which have the potential to emit fugitive particulate matter:**
 - Truck Receiving
 - Internal Handling
 - Truck Shipping
 - Rail Shipping
 - Storage Bin Vents
 - Unpaved Roads
 - Grain Dryer
4. **A map of the source showing aggregate pile areas, access areas around the aggregate pile, unpaved roads, paved roads, parking lots and location of conveyor and transfer points, etc.**
The aggregate pile, equipped with a storage ring, as well as the other above mentioned items, is noted on the attached map.
5. **The number and mix of vehicular activity occurring on paved roads, unpaved roads, and parking lots.**
Heavy Duty Diesel Trucks will be delivering and receiving grain at the site. All roads on site are unpaved. There is no parking lot on site. Employees park in an area near the office.
6. **Type and quantity of material handled.**
This facility is a grain elevator handling approximately 15,000,000 bushels annually.
7. **Equipment used to maintain aggregate piles.**
The aggregate pile is equipped with a storage ring that is filled once per year with grain. The grain is placed in the ring using a fill conveyor and removed from the ring using an end loader. Trucks transferring material to the pile will be covered. When the pile has reached maximum capacity it will be covered with a tarp. The pile will remain covered until the material is transferred out of storage.
8. **A description of the measures to be implemented to control fugitive particulate matter emissions resulting from emission points identified in section 3.**
The facility has implemented several measures to control fugitive dust at the facility. The truck receiving areas are partially enclosed. The internal handling system is enclosed, except for belts 12-16 which have a cover, but are not completely enclosed. The truck/rail shipping utilizes sleeves that extend into the container.
9. **A specification of the dust suppressant material, such as oil or chemical including estimated frequency of application rates and concentrations.**
An oil and sand pack will be applied on an as needed to the unpaved roadways.
10. **A specification of the particulate matter collection equipment used as a fugitive particulate matter emission control measure.**
The facility does not utilize any fugitive particulate matter collection equipment.

11. A schedule of compliance with the provisions of the control plan. Such schedule shall specify the amount of time the source requires to award any necessary contracts, commence and complete construction, installation, or modification of the fugitive particulate matter emission control measures. The facility changes sleeves on the loadout and oils the unpaved roads on an as needed basis. Typically once a problem is noticed it can be resolved within the week.

12. Other relevant data.
No other data.

Attachment: Emission Calculations

Company Name: ADM Grain Company, Sullivan Elevator
 Source Address: 3232 North Holloway Sullivan, IN 47882
 MSOP: 153-23403-00002
 Notice Only Change: 153-30433-00002
 Reviewer: Nathan C. Bell

| Process/emission unit | Uncontrolled Potential to Emit (tons/year) | | | | | | | | | | | |
|--------------------------|--|--------------|--------------|-----------------|-------------|-------------|-------------|---------------------------|-------------|------------------|-----------------|---|
| | PM | PM10 | PM2.5 | SO ₂ | NOx | VOC | CO | GHGs as CO ₂ e | Total HAPs | Worst Single HAP | | |
| Receiving | 38.03 | 12.20 | 2.07 | - | - | - | - | - | - | - | - | - |
| Rail and Truck Shipping | 23.22 | 7.83 | 1.32 | - | - | - | - | - | - | - | - | - |
| Internal Handling | 16.47 | 9.18 | 1.57 | - | - | - | - | - | - | - | - | - |
| Storage Bins | 6.75 | 1.70 | 0.30 | - | - | - | - | - | - | - | - | - |
| Column Dryer | 59.40 | 14.85 | 2.54 | - | - | - | - | - | - | - | - | - |
| Column Dryer, combustion | 0.11 | 0.46 | 0.46 | 0.04 | 6.01 | 0.33 | 5.05 | 7258.02 | 0.11 | 0.11 | (hexane) | - |
| Paved Roads | 0.95 | 0.19 | 0.03 | - | - | - | - | - | - | - | - | - |
| Unpaved Roads | 10.03 | 2.56 | 2.56 | - | - | - | - | - | - | - | - | - |
| Ground Pile | 1.13 | 0.53 | 0.08 | - | - | - | - | - | - | - | - | - |
| Totals | 156.09 | 49.49 | 10.91 | 0.04 | 6.01 | 0.33 | 5.05 | 7258.02 | 0.11 | 0.11 | (hexane) | |

| Process/emission unit | Controlled Potential to Emit (tons/year) | | | | | | | | | | | |
|--------------------------|--|--------------|-------------|-----------------|-------------|-------------|-------------|---------------------------|-------------|------------------|-----------------|---|
| | PM | PM10 | PM2.5 | SO ₂ | NOx | VOC | CO | GHGs as CO ₂ e | Total HAPs | Worst Single HAP | | |
| Receiving | 38.03 | 12.20 | 2.07 | - | - | - | - | - | - | - | - | - |
| Rail and Truck Shipping | 4.64 | 1.57 | 0.26 | - | - | - | - | - | - | - | - | - |
| Internal Handling | 1.65 | 0.92 | 0.16 | - | - | - | - | - | - | - | - | - |
| Storage Bins | 6.75 | 1.70 | 0.30 | - | - | - | - | - | - | - | - | - |
| Column Dryer | 11.88 | 2.97 | 0.51 | - | - | - | - | - | - | - | - | - |
| Column Dryer, combustion | 0.11 | 0.46 | 0.46 | 0.04 | 6.01 | 0.33 | 5.05 | 7258.02 | 0.11 | 0.11 | (hexane) | - |
| Paved Roads | 0.95 | 0.19 | 0.03 | - | - | - | - | - | - | - | - | - |
| Unpaved Roads | 5.01 | 1.28 | 1.28 | - | - | - | - | - | - | - | - | - |
| Ground Pile | 1.13 | 0.53 | 0.08 | - | - | - | - | - | - | - | - | - |
| Totals | 70.16 | 21.81 | 5.13 | 0.04 | 6.01 | 0.33 | 5.05 | 7258.02 | 0.11 | 0.11 | (hexane) | |

Attachment: Emission Calculations
 PM and PM10 Emissions From the Grain Handling, Storage and Drying Processes

Company Name: ADM Grain Company, Sullivan Elevator
 Source Address: 3232 North Holloway Sullivan, IN 47882
 MSOP: 153-23403-00002
 Notice Only Change: 153-30433-00002
 Reviewer: Nathan C. Bell

1. Maximum Throughput Calculation

This source has requested had an increase in their throughput of grain and defined the annual maximum requested throughput as 450,000 tons per year. IDEM multiplied the requested throughput by an adjustment factor 1.2 to constitute a realistic upper bound on the amount of grain this country elevator could receive (540,000 tons per year).

| Year | Grain Received (bushels/yr) | (tons/yr) |
|------|-----------------------------|-----------|
| 2001 | 10,315,652 | 309,470 |
| 2002 | 8,622,180 | 258,665 |
| 2003 | 8,754,504 | 262,635 |
| 2004 | 9,101,867 | 273,056 |
| 2005 | 10,060,763 | 301,823 |

2. PTE Calculations

| Emissions Unit Description | Maximum Grain Throughput (tons/yr) | PM Emission Factor (lbs/ton) | PM10 Emission Factor (lbs/ton) | PM2.5 Emission Factor (lbs/ton) | Control Device(s) | Collection and Control Efficiency (%) | PTE of PM Before Control (tons/yr) | PTE of PM10 Before Control (tons/yr) | PTE of PM2.5 Before Control (tons/yr) | PTE of PM After Control (tons/yr) | PTE of PM10 After Control (tons/yr) | PTE of PM2.5 After Control (tons/yr) |
|------------------------------|------------------------------------|------------------------------|--------------------------------|---------------------------------|-------------------|---------------------------------------|------------------------------------|--------------------------------------|---------------------------------------|-----------------------------------|-------------------------------------|--------------------------------------|
| Receiving - Straight Truck * | 394,200 | 0.18 | 0.059 | 0.010 | NA | 0% | 35.48 | 11.63 | 1.97 | 35.48 | 11.63 | 1.97 |
| Receiving - Hopper Truck | 145,800 | 0.035 | 0.0078 | 0.0013 | NA | 0% | 2.55 | 0.57 | 0.09 | 2.55 | 0.57 | 0.09 |
| Shipping - Truck * | 540,000 | 0.086 | 0.029 | 0.0049 | Spouts/sleeves | 80% | 23.22 | 7.83 | 1.32 | 4.64 | 1.57 | 0.26 |
| Shipping - Railcar | 0 | 0.027 | 0.0022 | 0.00037 | Spouts/sleeves | 80% | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Internal Handling | 540,000 | 0.061 | 0.034 | 0.0058 | Enclosed | 90% | 16.47 | 9.18 | 1.57 | 1.65 | 0.92 | 0.16 |
| Storage - Silos and Bins | 540,000 | 0.025 | 0.0063 | 0.0011 | NA | 0% | 6.75 | 1.70 | 0.30 | 6.75 | 1.70 | 0.30 |
| Drying - Column Dryer** | 540,000 | 0.22 | 0.055 | 0.0094 | Perforation Plate | 80% | 59.40 | 14.85 | 2.54 | 11.88 | 2.97 | 0.51 |
| Totals | | | | | | | 143.87 | 45.76 | 7.79 | 62.95 | 19.35 | 3.29 |

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

* Receiving and shipping by truck produces more particulate emissions than receiving and shipping by railcar. To constitute a realistic maximum particulate emissions IDEM has assumed a maximum amount of shipping and receiving is handled by truck with the balance handled by railcar.

**In 2005, the source dried nine percent (9%) of received grain. For the potential to emit, IDEM has assumed all received grain is dried.

Methodology

Maximum Grain Throughput (tons/yr) = Adjustment Factor (1.2) x Requested Throughput (450,000 tons/yr)
 Maximum Receiving - Straight Truck (tons/yr) = Maximum Throughput Truck Receiving Pits (bushels/yr) x 60 (lbs/bushel) x 1 ton/2000 lbs x 8760 hrs/yr
 PTE of PM/PM10 Before Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs
 PTE of PM/PM10 After Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs x (1- Control Efficiency (%))

Attachment: Emission Calculations
PM Emissions From the Grain Handling, Storage and Drying Processes
Demonstration of Compliance with 326 IAC 6-3-2

Company Name: ADM Grain Company, Sullivan Elevator
 Source Address: 3232 North Holloway Sullivan, IN 47882
 MSOP: 153-23403-00002
 Notice Only Change: 153-30433-00002
 Reviewer: Nathan C. Bell

Allowable Emissions Under 326 IAC 6-3-2

| Emissions Unit Description | Maximum (bushels/hr) | Maximum Process Weight (tons/hr) | PM Emission Factor (lbs/ton) | Control Device(s) | Collection and Control Efficiency (%) | PM Emissions Before Control (lbs/hr) | 326 IAC 6-3-2 Allowable PM Emissions (lbs/hr) | PM Emissions After Control (lbs/hr) |
|----------------------------|----------------------|----------------------------------|------------------------------|-------------------|---------------------------------------|--------------------------------------|---|-------------------------------------|
| North Truck Receiving Pit | 250 | 7.50 | 0.18 | NA | 0% | 1.35 | 15.8 | 1.35 |
| South Truck Receiving Pit | 850 | 25.5 | 0.18 | NA | 0% | 4.59 | 35.9 | 4.59 |
| East Truck Receiving Pit | 400 | 12.0 | 0.18 | NA | 0% | 2.16 | 21.7 | 2.16 |
| 12 Drag | 7,500 | 225 | 0.061 | Enclosed | 90% | 13.7 | 59.8 | 1.37 |
| Ground Pile Drag | 8,500 | 255 | 0.061 | Enclosed | 90% | 15.6 | 61.2 | 1.56 |
| Transfer Drag | 5,000 | 150 | 0.061 | Enclosed | 90% | 9.15 | 55.4 | 0.92 |
| Dryer Drag | 4,000 | 120 | 0.061 | Enclosed | 90% | 7.32 | 53.1 | 0.73 |
| 12/13 Belt | 7,500 | 225 | 0.061 | Enclosed | 90% | 13.7 | 59.8 | 1.37 |
| 13/14 Belt | 7,500 | 225 | 0.061 | Enclosed | 90% | 13.7 | 59.8 | 1.37 |
| 14/15 Belt | 7,500 | 225 | 0.061 | Enclosed | 90% | 13.7 | 59.8 | 1.37 |
| 15/16 Belt | 7,500 | 225 | 0.061 | Enclosed | 90% | 13.7 | 59.8 | 1.37 |
| 30 Belt | 10,000 | 300 | 0.061 | Enclosed | 90% | 18.30 | 63.0 | 1.83 |
| East OH Belt | 10,000 | 300 | 0.061 | Enclosed | 90% | 18.30 | 63.0 | 1.83 |
| 14/15/16 Reclaim | 9,000 | 270 | 0.061 | Enclosed | 90% | 16.5 | 61.8 | 1.65 |
| 21 Reclaim | 20,000 | 600 | 0.061 | Enclosed | 90% | 36.6 | 71.2 | 3.66 |
| 22 Reclaim | 20,000 | 600 | 0.061 | Baghouse | 99.95% | 36.6 | 71.2 | 0.02 |
| 23 Reclaim | 20,000 | 600 | 0.061 | Baghouse | 99.95% | 36.6 | 71.2 | 0.02 |
| 22/23 Reclaim | 20,000 | 600 | 0.061 | Baghouse | 99.95% | 36.6 | 71.2 | 0.02 |
| 6/7/8 Reclaim Drag | 25,000 | 750 | 0.061 | Enclosed | 90% | 45.8 | 73.9 | 4.58 |
| 17/18 Reclaim Drag | 3,000 | 90 | 0.061 | Enclosed | 90% | 5.5 | 50.2 | 0.55 |
| 19/20 Reclaim Drag | 3,000 | 90 | 0.061 | Enclosed | 90% | 5.5 | 50.2 | 0.55 |
| 19/20 Fill Drag | 3,000 | 90 | 0.061 | Enclosed | 90% | 5.5 | 50.2 | 0.55 |
| 21 Fill | 20,000 | 600 | 0.061 | Enclosed | 90% | 36.6 | 71.2 | 3.66 |
| 22 Fill | 20,000 | 600 | 0.061 | Baghouse | 99.95% | 36.6 | 71.2 | 0.02 |
| 23 Fill | 20,000 | 600 | 0.061 | Baghouse | 99.95% | 36.6 | 71.2 | 0.02 |
| East Pit Drag | 20,000 | 600 | 0.061 | Baghouse | 99.95% | 36.6 | 71.2 | 0.02 |
| North Pit Drag | 4,500 | 135 | 0.061 | Enclosed | 90% | 8.24 | 109.7 | 0.82 |
| South Pit Drag | 10,000 | 300 | 0.061 | Enclosed | 90% | 18.30 | 187.3 | 1.83 |
| East Leg | 20,000 | 600 | 0.061 | Baghouse | 99.95% | 36.6 | 71.2 | 0.02 |
| Rail High Roller | 35,000 | 1,050 | 0.061 | Enclosed | 90% | 64.1 | 78.2 | 6.41 |
| Truck Shipping (EP-3) | 40,000 | 1,200 | 0.086 | Spouts/sleeves | 80% | 103.2 | 80.0 | 20.6 |
| Rail Shipping (EP-4) | 35,000 | 1,050 | 0.086 | Spouts/sleeves | 80% | 90.3 | 78.2 | 18.1 |
| Truck Shipping (EP-5) | 3,000 | 90 | 0.086 | Spouts/sleeves | 80% | 7.7 | 50.2 | 1.5 |

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67}$$

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

Where the process weight rate is in excess of sixty thousand (60,000) pounds per hour calculate the allowable emissions using 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

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

Methodology

Maximum Grain Throughput (tons/hr) = Maximum Grain Throughput (bushels/hr) x 60 (lbs/bushel) x 1 ton/2000 lbs
 PTE of PM/PM10 Before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton)
 PTE of PM/PM10 After Control (tons/yr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton) x (1 - Control Efficiency (%))

Attachment: Emission Calculations
Grain Drying - Natural Gas Combustion
MM BTU/HR <100

Company Name: ADM Grain Company, Sullivan Elevator
 Source Address: 3232 North Holloway Sullivan, IN 47882
 MSOP: 153-23403-00002
 Notice Only Change: 153-30433-00002
 Reviewer: Nathan C. Bell

| Unit | Maximum Heat Input Capacity (MMBtu/hr) | High Heat Value (MMBtu/MMscf) | Potential Throughput (MMcf/yr) |
|---------------|--|-------------------------------|--------------------------------|
| Grain Dryer | 14 | 1020 | 120.24 |
| Totals | 14.00 | | 120.24 |

| Criteria Pollutants | Pollutant | | | | | | |
|-------------------------------|-----------|-------|--------|-------|--------------------|------|------|
| | PM* | PM10* | PM2.5* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMcf | 1.9 | 7.6 | 7.6 | 0.6 | 100 **see below | 5.5 | 84 |
| Potential Emission in tons/yr | 0.11 | 0.46 | 0.46 | 0.036 | 6.01 | 0.33 | 5.05 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 assumed equal to PM10

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

| Hazardous Air Pollutants | HAPs - Organics* | | | | | HAPs - Metals* | | | | |
|-------------------------------|------------------|-----------|--------------|---------|-----------|----------------|-----------|-----------|-----------|-----------|
| | Benzene | DCB | Formaldehyde | Hexane | Toluene | Pb | Cd | Cr | Mn | Ni |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 1.262E-04 | 7.214E-05 | 4.509E-03 | 0.11 | 2.044E-04 | 3.006E-05 | 6.613E-05 | 8.416E-05 | 2.284E-05 | 1.262E-04 |

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,020,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Potential to Emit Total HAPs (tons/year) = **0.11**

| Greenhouse Gases (GHGs) | Greenhouse Gas (GHG) | | |
|---------------------------------------|----------------------|------|------|
| | CO2 | CH4 | N2O |
| Emission Factor in lb/MMcf | 120000 | 2.3 | 2.2 |
| Potential Emission in tons/yr | 7214.12 | 0.14 | 0.13 |
| Summed Potential Emissions in tons/yr | 7214.39 | | |
| CO2e Total in tons/yr | 7258.02 | | |

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 SO2 = Sulfur Dioxide
 NOx = Nitrous Oxides
 VOC = Volatile Organic Compounds
 CO = Carbon Monoxide

DCB = Dichlorobenzene
 Pb = Lead
 Cd = Cadmium
 Cr = Chromium
 Mn = Manganese
 Ni = Nickel

CO2 = Carbon Dioxide
 CH4 = Methane
 N2O = Nitrous Oxide
 CO2e = CO2 equivalent emissions

**Attachment: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: ADM Grain Company, Sullivan Elevator
 Source Address: 3232 North Holloway Sullivan, IN 47882
 MSOP: 153-23403-00002
 Notice Only Change: 153-30433-00002
 Reviewer: Nathan C. Bell

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (11/2006).

Vehicle information (provided by source)

| Type | Maximum number of vehicles | Number of two-way trips per day per vehicle | Maximum trips per day (trip/day) | Maximum Weight Loaded (tons/trip) | Total Weight driven per day (ton/day) | Maximum two-way distance (feet/trip) | Maximum two-way distance (mi/trip) | Maximum two-way (miles/day) | Maximum two-way miles (miles/yr) |
|--|----------------------------|---|----------------------------------|-----------------------------------|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------|----------------------------------|
| Vehicle (entering, leaving plant) (two-way trip) | 45.6 | 1.0 | 45.6 | 26.0 | 1185.6 | 693 | 0.131 | 6.0 | 2183.9 |
| Total | | | 45.6 | | 1185.6 | | | | 2183.9 |

Average Vehicle Weight Per Trip = 26.0 tons/trip
 Average Miles Per Trip = 0.13 miles/trip

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

| | PM | PM10 | PM2.5 | |
|-----------|---------|---------|---------|--|
| where k = | 0.082 | 0.016 | 0.0024 | lb/mi = particle size multiplier (AP-42 Table 13.2.1-1) |
| W = | 26.0 | 26.0 | 26.0 | tons = average vehicle weight (provided by source) |
| C = | 0.00047 | 0.00047 | 0.00036 | lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2) |
| sL = | 0.6 | 0.6 | 0.6 | g/m ² = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months) |

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$
 where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = 365 days per year

| | PM | PM10 | PM2.5 | |
|-----------------------------------|-------|-------|--------|---------|
| Unmitigated Emission Factor, Ef = | 0.956 | 0.186 | 0.0276 | lb/mile |
| Mitigated Emission Factor, Eext = | 0.874 | 0.170 | 0.0253 | lb/mile |

| Process | Unmitigated PTE of PM (tons/yr) | Unmitigated PTE of PM10 (tons/yr) | Unmitigated PTE of PM2.5 (tons/yr) | Mitigated PTE of PM (tons/yr) | Mitigated PTE of PM10 (tons/yr) | Mitigated PTE of PM2.5 (tons/yr) |
|--|---------------------------------|-----------------------------------|------------------------------------|-------------------------------|---------------------------------|----------------------------------|
| Vehicle (entering, leaving plant) (two-way trip) | 1.04 | 0.20 | 0.03 | 0.95 | 0.19 | 0.03 |
| | 1.04 | 0.20 | 0.03 | 0.95 | 0.19 | 0.03 |

Methodology

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

Abbreviations

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particulate Matter (<2.5 um)
- PTE = Potential to Emit

**Attachment: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name: ADM Grain Company, Sullivan Elevator
 Source Address: 3232 North Holloway Sullivan, IN 47882
 MSOP: 153-23403-00002
 Notice Only Change: 153-30433-00002
 Reviewer: Nathan C. Bell

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

| Type | Maximum number of vehicles | Number of two-way trips per day per vehicle | Maximum trips per day (Trips/day) | Maximum Weight Loaded (tons/trip) | Total Weight driven per day (ton/day) | Maximum two-way distance (feet/trip) | Maximum two-way distance (mi/trip) | Maximum two-way miles (miles/day) | Maximum two-way miles (miles/yr) |
|---|----------------------------|---|-----------------------------------|-----------------------------------|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------------|----------------------------------|
| Vehicle (entering plant) (two-way trip) | 45.6 | 1.0 | 45.6 | 26.0 | 1185.6 | 1419 | 0.269 | 12.3 | 4474.0 |
| Total | | | 45.6 | | 1185.6 | | | 12.3 | 4474.0 |

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

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

| | PM | PM10 | PM2.5 | |
|-----------|------|------|-------|--|
| where k = | 4.9 | 1.5 | 1.5 | lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads) |
| s = | 4.8 | 4.8 | 4.8 | % = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant) |
| a = | 0.7 | 0.9 | 0.9 | = constant (AP-42 Table 13.2.2-2 for Industrial Roads) |
| W = | 26.0 | 26.0 | 26.0 | tons = average vehicle weight (provided by source) |
| b = | 0.45 | 0.45 | 0.45 | = constant (AP-42 Table 13.2.2-2 for Industrial Roads) |

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$

where P = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

| | PM | PM10 | PM2.5 | |
|-----------------------------------|------|------|-------|---------|
| Unmitigated Emission Factor, Ef = | 6.82 | 1.74 | 1.74 | lb/mile |
| Mitigated Emission Factor, Eext = | 4.48 | 1.14 | 1.14 | lb/mile |
| Dust Control Efficiency = | 50% | 50% | 50% | |

| Process | Unmitigated PTE of PM (tons/yr) | Unmitigated PTE of PM10 (tons/yr) | Unmitigated PTE of PM2.5 (tons/yr) | Mitigated PTE of PM (tons/yr) | Mitigated PTE of PM10 (tons/yr) | Mitigated PTE of PM2.5 (tons/yr) | Controlled PTE of PM (tons/yr) | Controlled PTE of PM10 (tons/yr) | Controlled PTE of PM2.5 (tons/yr) |
|---|---------------------------------|-----------------------------------|------------------------------------|-------------------------------|---------------------------------|----------------------------------|--------------------------------|----------------------------------|-----------------------------------|
| Vehicle (entering plant) (two-way trip) | 15.25 | 3.89 | 3.89 | 10.03 | 2.56 | 2.56 | 5.01 | 1.28 | 1.28 |

Methodology

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

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particulate Matter (<2.5 um)
 PTE = Potential to Emit

**Attachment: Emission Calculations
PM and PM10 Emissions from Gound Pile**

Company Name: ADM Grain Company, Sullivan Elevator
Source Address: 3232 North Holloway Sullivan, IN 47882
MSOP: 153-23403-00002
Notice Only Change: 153-30433-00002
Reviewer: Nathan C. Bell

| Material Transferred (tons/yr) | PM Emission Factor (lbs/ton) | PM10 Emission Factor (lbs/ton) | PM2.5 Emission Factor (lbs/ton) | PTE of PM (tons/yr) | PTE of PM10 (tons/yr) | PTE of PM2.5 (tons/yr) |
|--------------------------------|------------------------------|--------------------------------|---------------------------------|---------------------|-----------------------|------------------------|
| 540,000 | 4.17E-03 | 1.97E-03 | 2.99E-04 | 1.13 | 0.53 | 0.08 |

Emission factors are from AP 42 Section 13.2.4 Aggregate Handling And Storage Piles - November 2006.
 Source moisture was from Table 13.2.4-1 - Stone quarrying and processing.

Methodology

Potential to Emit (tons/yr) = Material Transferred (tons/yr) * Particulate Emission Factor (lbs/ton) * 1 ton / 2,000 lbs

$$E = k (0.0032) * ((U/5)^{1.3}) / ((M/2)^{1.4})$$

Where:

- E = emission factor (lb particulate per ton of material transferred)
- k = 0.74 particle size multiplier (dimensionless) for PM
- 0.35 particle size multiplier (dimensionless) for PM10
- 0.053 particle size multiplier (dimensionless) for PM2.5
- U = 8.15 mean wind speed, meters per second (m/s) (miles per hour [mph])
- M = 2.1 material moisture content (%)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Miranda Gerard
ADM Grain Co
4666 Faries Pkwy
Decatur IL 62525

DATE: September 2, 2011

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

SUBJECT: Final Decision
MSOP
153-30433-00002

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

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

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

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

| | | | | |
|----------------------------|---|---|---|--|
| IDEM Staff | DPABST 9/2/2011 ADM Grain Company 153-30433-00002(Final) | | Type of Mail: CERTIFICATE OF MAILING ONLY | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
| Name and address of Sender | ▶ | Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204 | | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handling Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee |
|------|----------------|---|---------|------------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|
| | | | | | | | | | | | Remarks |
| 1 | | Miranda Gerard ADM Grain Company 4666 Faries Pkwy Decatur IL 62525 (Source CAATS) (CONFIRM DELIVERY) | | | | | | | | | |
| 2 | | Jeffrey J Becker VP - US Grain Ops & Engineering ADM Grain Company 4666 Faries Pkwy Decatur IL 62525 (RO CAATS) | | | | | | | | | |
| 3 | | Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party) | | | | | | | | | |
| 4 | | Sullivan City Council and Mayors Office 32 N. Court St. Sullivan IN 47882 (Local Official) | | | | | | | | | |
| 5 | | Sullivan County Health Department 31 N Court Street Sullivan IN 47882-1509 (Health Department) | | | | | | | | | |
| 6 | | Sullivan County Commissioners 100 Courthouse Square Sullivan IN 47882-1593 (Local Official) | | | | | | | | | |
| 7 | | Mr. Richard Monday 545 E. Margaret Dr. Terre Haute IN 47801 (Affected Party) | | | | | | | | | |
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| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
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