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: August 23, 2011

RE: Monsanto Company / 159-30707-00010

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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Craig Weitbrecht
Monsanto Company
908 North Independence Street
Windfall, Indiana 46076

August 23, 2011

Re: 159-30707-00010
Second Notice-Only Change to
M159-25423-00010

Dear Craig Weitbrecht:

Monsanto Company was issued a Minor Source Operating Permit (MSOP) Renewal No. M159-25423-00010 on June 4, 2008, for a stationary soybean seed processing plant located at 908 North Independence Street, Windfall, Indiana 46076. On July 14, 2011, the Office of Air Quality (OAQ) received an application from the source requesting the following:

1. To add a new baghouse, identified as Baghouse 14A, to control several existing internal handling units within the facility. In addition, the source requested to include a description of the internal handling system in the permit in order to clearly identify each of the internal handling units that will exhaust to the new baghouse. Since the current emission calculations for the source include calculations for internal handling, inclusion of a description of the internal handling system will not change the potential emissions from the internal handling units. The source has indicated that no new internal handling units will be constructed as part of this change. This change to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(2).

2. To revise the emission unit description for the seed packaging area to include a new dumping station and two new conveyors that will be controlled by the existing dust collector 8A. The purpose of the dumping station is to provide greater flexibility in the movement of soybean seeds through the plant. The dumping station will not increase the source-wide potential production capacity of 60,000 pounds of soybean seeds per hour and will not increase the potential to emit from the seed packaging area. The addition of the new dumping station and two new conveyors to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(13), since the new grain handling equipment is similar to the other permitted grain handling equipment and will comply with the same applicable requirements and permit terms and conditions as the other permitted grain handling equipment.

3. To add a new 0.5 MMBtu/hr natural gas-heated treater conveyor to the permit. Due to the low volume of heated air (3000 acfm) that will be passed through the conveyor, the source estimates that the particulate emissions will be negligible. In addition, any VOC that may volatilize from the treated seeds in the heated conveyor have already been accounted for in the existing treater emission calculations. The addition of these units to the permit is considered a notice-only change, since the potential emissions of regulated criteria pollutants and hazardous air pollutants are less than the ranges specified 326 IAC 2-6.1-6(g)(4) and 326 IAC 2-6.1-6(d)(10), respectively. 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 unit 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.

4. To revise the emission unit description for the four (4) storage bins, identified as Storage Bins, to correct a typographical error in the baghouse identification number. The correct baghouse

identification number is 11A.

5. To add to the permit an emission unit description for an existing truck loading system for bulk seed bags, identified as True Bulk Loadout. The addition of the loadout system to the permit is considered a notice-only change, since the potential emissions of regulated criteria pollutants and hazardous air pollutants are less than the ranges specified 326 IAC 2-6.1-6(g)(4) and 326 IAC 2-6.1-6(d)(10), respectively (see attached 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 unit 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.

6. To add to the permit an emission unit description for forty-one (41) existing bulk storage bins for receiving grain that will be loaded and unloaded using portable conveyors. The addition of the forty-one (41) bulk storage bins and portable conveyors to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(13), since the bulk storage bins and conveyors are similar to the other permitted bulk storage bins and conveyors and will comply with the same applicable requirements and permit terms and conditions as the other permitted bulk storage bins and conveyors.

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**.

1. Section A.2 and D.1 have been revised as follows to include emission unit descriptions for the new and existing equipment described above. Condition D.1.1 has been revised to include a 326 IAC 6-3-2 allowable particulate emission rate for the new and existing equipment described above and the surge bins, and to rearrange the order and revise the description of emission units listed in the table to match the emission unit description list and to provide further clarification. Condition D.1.4 has been revised to include a PSD minor limit for the new and existing equipment described above and to rearrange the order of emission units listed in the table to match the emission unit description list.

A.2 Emission Units and Pollution Control Equipment Summary

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

...

(g) Four (4) storage bins, identified as Storage Bins, constructed in 2005, each with a maximum grain storage capacity of one thousand (1,000) bushels, using baghouse ~~8A~~ **11A** for particulate control, and exhausting to stack ~~8A~~ **11A** which vents inside the building.

(h) One (1) seed packaging area, identified as Packaging Tower, consisting of storage bins, scales, conveyors, mini-bulk bagging system, bulk bagging system and bag filters, constructed in 1992**, and a dumping station, approved for construction in 2011**, with a maximum throughput of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.

(i) Two (2) seed treaters, identified as Treater 1 and Treater 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.

(j) Two (2) surge bins, identified as Surge Bin1 and Surge Bin 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean

seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

(k) One (1) internal handling system, identified as Internal Handling, with a maximum capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 14A for particulate control, exhausting to stack 14A which vents outside the building, and consisting of the following equipment:

(1) Five (5) bulk holding bins, each constructed in 1983 (minibulk bins) and 1992 (paper bag bins), respectively;

(2) One (1) bucket elevator, constructed in 2005 and modified in 2009;

(3) One (1) batch weighing scale, constructed in 2005;

(4) Two (2) conveyor loading boxes, each constructed in 2002; and

(5) Basement legs and conveyors, each constructed in 1983.

(l) One (1) treated seed heated conveyor, approved for construction in 2011, using a natural gas-fired burner with a maximum heat input capacity of 0.5 million British thermal units per hour (MMBtu/hr).

(m) One (1) truck loading system for bulk seed bags, identified as True Bulk Loadout, constructed in 2004, with a maximum capacity of 1,250 bushels per hour of soybeans, using baghouse 28A for industrial hygiene purposes, and exhausting to stack 28A, which vents inside the building.

(n) Forty-one (41) bulk storage bins, each constructed between 1983 and 1998, each with a maximum storage volume of approximately 3,000 bushels, and each may be loaded and unloaded using portable conveyors and equipment at a maximum capacity of 1,000 bushels per hour.

(~~k~~**o**) Fugitive emissions from paved/unpaved roads and lots.

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

(g) Four (4) storage bins, identified as Storage Bins, constructed in 2005, each with a maximum grain storage capacity of one thousand (1,000) bushels, using baghouse ~~8A~~ **11A** for particulate control, and exhausting to stack ~~8A~~ **11A** which vents inside the building.

(h) One (1) seed packaging area, identified as Packaging Tower, consisting of storage bins, scales, conveyors, mini-bulk bagging system, bulk bagging system and bag filters, constructed in 1992**, a dumping station, approved for construction in 2011**, with a maximum throughput of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.

...

Emissions Unit Description (continued):

(k) One (1) internal handling system, identified as Internal Handling, with a maximum capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 14A for particulate control, exhausting to stack 14A which vents outside the building, and consisting of the following equipment:

(1) Five (5) bulk holding bins, each constructed in 1983 (minibulk bins) and 1992 (paper bag bins), respectively;

(2) One (1) bucket elevator, constructed in 2005 and modified in 2009;

(3) One (1) batch weighing scale, constructed in 2005;

(4) Two (2) conveyor loading boxes, each constructed in 2002; and

(5) Basement legs and conveyors, each constructed in 1983.

(m) One (1) truck loading system for bulk seed bags, identified as True Bulk Loadout, constructed in 2004, with a maximum capacity of 1,250 bushels per hour of soybeans, using baghouse 28A for industrial hygiene purposes, and exhausting to stack 28A, which vents inside the building.

(n) Forty-one (41) bulk storage bins, each constructed between 1983 and 1998, each with a maximum storage volume of approximately 3,000 bushels, and each may be loaded and unloaded using portable conveyors and equipment at a maximum capacity of 1,000 bushels per hour.

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

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

D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

...

Facility	Process Weight (tons/hr)	Particulate Emission Limit (lbs/hr)
Soybean Receiving Pit **(1E)**	90	50.23
Cleaners **(3E)**~~(2)~~ (per cleaner)	15	25.16
~~Each of~~ Color Sorters **(**9EA and 9EB**)** **(per color sorter)**	15	25.16
Gravity Tables **(5E, 6E and 7E)**~~(3)~~ (per gravity table)	10	19.18
~~Packaging~~	~~30~~	~~40.04~~
Aspirators **(2E)**	30	40.04

Facility	Process Weight (tons/hr)	Particulate Emission Limit (lbs/hr)
Storage Bins	30	40.04
Packaging Tower	**30**	**40.04**
Seed Treaters **(both seed treaters combined)**	15	25.16
Surge Bins (per surge bin)	**30**	**40.04**
Internal Handling	**30**	**40.04**
Bulk Storage Bins with Portable Conveyors	**30**	**40.04**

...

D.1.4 PSD Minor Limit [326 IAC 2-2]

...

Emission Units	Limited Soybean Throughput (tons/yr)	PM Emission Limit (lbs PM / ton Soybeans)	Limited PM Emissions (tons/yr)
Soybean receiving pit (1E)	150,000	0.035	2.63
~~Internal Handling~~	~~150,000~~	~~0.061~~	~~4.58~~
Cleaners (3E)	150,000	0.750	56.25
Color sorters (9EA, 9EB, and 9EC)	150,000	0.061	13.73
Gravity tables (5E, 6E, and 7E)	150,000	0.750	56.25
Aspirators (2E)	150,000	0.030	2.25
Storage bins	150,000	0.025	1.88
Packaging Tower	150,000	0.061	4.58
Seed Treaters	150,000	0.061	4.58
Surge Bins	150,000	0.025	1.88
Internal Handling	**150,000**	**0.061**	**4.58**
Bulk Storage Bins with Portable Conveyors	**150,000**	**0.035**	**2.63**

...

IDEM, OAQ has decided to make additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

1. Section A.1 of the permit and the reporting forms have been revised to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.

2. For clarity, IDEM has changed references to the general conditions: “in accordance with Section B”, in accordance with Section C”, or other similar language to "Section C...contains the Permittee’s obligations with regard to the records required by this condition.”

3. IDEM has decided that the phrases “no later than” and “not later than” are clearer than “within” in relation to the end of a timeline. Therefore all timelines have been switched to “no later than” or “not later than” except when the underlying rule states “within.”

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

5. IDEM has decided to clarify the requirements of Section B – Preventive Maintenance Plan and to add a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans.

6. IDEM has revised the language of the Section B - Preventive Maintenance Plan and Section C - General Reporting to allow the Permittee to not have to begin implementing the requirements of these conditions until ninety day after initial start up.

7. IDEM has revised the language of the Section B - Permit Renewal and Section B - Termination of Right to Operate to change the MSOP renewal application due date to one hundred twenty (120) prior to expiration of the current permit in order to match the rule.

8. IDEM has revised Section B - Permit Renewal paragraph (c) to state which rule establishes the authority to set a deadline for the Permittee to submit additional information.

9. IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.

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

11. IDEM has revised the language of the Section C - Asbestos Abatement Projects to change the terminology "Accredited" to "Licensed" in order to match the rule.

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

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

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

15. IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been

moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.

16. The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

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

The permit has been revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

~~Mailing Address: P.O. Box 367, Windfall, IN 46036~~

...

~~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, M 159-25423-00010, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.~~

~~(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.~~

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

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

~~(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or~~

~~(b) the emission unit to which the condition pertains permanently ceases operation.~~

~~B.4 Enforceability~~

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

~~B.5 Severability~~

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

~~B.6 Property Rights or Exclusive Privilege~~

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

~~B.7 Duty to Provide Information~~

~~(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.~~

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

~~B.8 Certification~~

~~(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~

~~(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.~~

~~(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).~~

~~B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]~~

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

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

~~Indiana Department of Environmental Management~~
~~Compliance and Enforcement Branch, Office of Air Quality~~
~~100 North Senate Avenue~~
~~MC 61-53 IGCN 1003~~
~~Indianapolis, 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.10 Preventive Maintenance Plan [326 IAC 1-6-3]~~

~~(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:~~

~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~

~~(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and~~

~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~

~~(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

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

~~(a) All terms and conditions of permits established prior to M 159-25423-00010 and issued pursuant to permitting programs approved into the state implementation plan have been either:~~

~~(1) incorporated as originally stated,~~

~~(2) revised, or~~

~~(3) deleted.~~

~~(b) All previous registrations and permits are superseded by this permit.~~

~~B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]~~

~~The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.~~

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

~~(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification 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 ninety (90) 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 in writing by IDEM, OAQ any additional information identified as being needed to process the application.~~

~~B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]~~

~~(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.~~

~~(b) Any application requesting an amendment or modification of this permit shall be submitted to:~~

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

~~Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]~~

~~B.15 Source Modification Requirement~~

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

~~B.16 Inspection and Entry~~
~~[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]~~

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

~~(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;~~

~~(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;~~

~~(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;~~

~~(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and~~

~~(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.~~

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

~~(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.~~

~~(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:~~

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

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

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

~~B.18 Annual Fee Payment [326 IAC 2-1.1-7]~~

~~(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.~~

~~(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.~~

~~B.19 Credible Evidence [326 IAC 1-1-6]~~

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

~~SECTION C SOURCE OPERATION CONDITIONS~~

~~Entire Source~~

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

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

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

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

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

~~(a) Violation of any conditions of this permit.~~

~~(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.~~

~~(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.~~

~~(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.~~

~~(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.~~

~~C.3 Opacity [326 IAC 5-1]~~

~~Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (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 or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.~~

~~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 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 by using ambient air quality modeling pursuant to 326 IAC 1-7-4.~~

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

~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~

~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~

~~(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or~~

~~(2) If there is a change in the following:~~

~~(A) Asbestos removal or demolition start date;~~

~~(B) Removal or demolition contractor; or~~

~~(C) Waste disposal site.~~

~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~

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

~~All required notifications shall be submitted to:~~

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

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

~~(e) Procedures for Asbestos Emission Control~~
~~The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

~~(f) Demolition and Renovation~~
~~The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).~~

~~(g) Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.~~

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

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

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

~~A test protocol, except as provided elsewhere in this permit, shall be submitted to:~~

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

~~no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

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

~~Compliance Requirements [326 IAC 2-1.1-11]~~

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

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

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

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

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

~~C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]~~

~~Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.~~

~~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~~

~~(a) Upon detecting an excursion or exceedance, the Permittee shall 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 emissions.~~

~~(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:~~

~~(1) initial inspection and evaluation;~~

~~(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or~~

~~(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.~~

~~(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 maintain the following records:~~

~~(1) monitoring data;~~

~~(2) monitor performance data, if applicable; and~~

~~(3) corrective actions 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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.~~

~~(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.~~

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

~~The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.~~

~~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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(d) 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 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, M159-25423-00010, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

B.8 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) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

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

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

(a) All terms and conditions of permits established prior to M159-25423-00010 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 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.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

C.12 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.13 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.14 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.15 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.16 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.17 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) 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.

...

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

A Preventive Maintenance Plan~~, in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for these facilities and any control devices. **Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

...

D.1.6 Record Keeping Requirement

(a) To document **the** compliance **status** with condition D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.3.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month **and each compliance period**.

(b) To document **the** compliance **status** with Condition D.1.4**(a)**, the Permittee shall maintain ~~monthly~~ records of the grain throughput for the entire source **each month and each compliance period**.

(c) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements, of this permit **contains the Permittee's obligations with regard to the records required by this condition**.

D.1.7 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Conditions D.1.3 and D.1.4(a) shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit,~~ using the reporting forms located at the end of this permit, or their equivalent, ~~within~~ **no later than** thirty (30) days after the end of the quarter being reported. **Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.**~~The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

...

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

Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.~~The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

...

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 O. Dumaual, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit and Update Emission Calculations

ACD/ncb

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

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

Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Monsanto Company
908 North Independence Street
Windfall, Indiana 46076

(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.: M159-25423-00010	
Issued by: Original Signed By: Alfred C. Dumaual, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: June 4, 2008 Expiration Date: June 4, 2018

First Significant Permit Revision No. 159-27714-00010, issued July 1, 2009
First Notice-Only Change No. 159-28475-00010, issued September 25, 2009

Second Notice-Only Change No. 159-30707-00010	
Issued by: Alfred C. Dumaual, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 23, 2011 Expiration Date: June 4, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary soybean seed processing plant.

Source Address:	908 North Independence Street, Windfall, IN 46076
General Source Phone Number:	765-945-7121
SIC Code:	0723
County Location:	Tipton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) soybean receiving pit, identified as 1E, constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

(b) Two (2) cleaners, identified as 3E, constructed prior to 1978, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

(c) Two (2) color sorters, identified as 9EA and 9EB, constructed in 2006, each with a maximum capacity of 15 tons of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

(d) One (1) color sorter, identified as 9EC, constructed in 2006, with a maximum capacity of 7.5 tons of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

(e) Three (3) gravity tables, identified as 5E, 6E and 7E, constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones, identified as 5A, 6A, 7A as controls, and exhausting to stacks 5A, 6A and 7A.

(f) Two (2) aspirators, (identified as 2E), constructed prior to 1978, with a maximum combined aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

(g) Four (4) storage bins, identified as Storage Bins, constructed in 2005, each with a maximum grain storage capacity of one thousand (1,000) bushels, using baghouse 11A

for particulate control, and exhausting to stack 11A which vents inside the building.

(h) One (1) seed packaging area, identified as Packaging Tower, consisting of storage bins, scales, conveyors, mini-bulk bagging system, bulk bagging system and bag filters, constructed in 1992, and a dumping station, approved for construction in 2011, with a maximum throughput of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.

(i) Two (2) seed treaters, identified as Treater 1 and Treater 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.

(j) Two (2) surge bins, identified as Surge Bin1 and Surge Bin 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

(k) One (1) internal handling system, identified as Internal Handling, with a maximum capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 14A for particulate control, exhausting to stack 14A which vents outside the building, and consisting of the following equipment:

(1) Five (5) bulk holding bins, each constructed in 1983 (minibulk bins) and 1992 (paper bag bins), respectively;

(2) One (1) bucket elevator, constructed in 2005 and modified in 2009;

(3) One (1) batch weighing scale, constructed in 2005;

(4) Two (2) conveyor loading boxes, each constructed in 2002; and

(5) Basement legs and conveyors, each constructed in 1983.

(l) One (1) treated seed heated conveyor, approved for construction in 2011, using a natural gas-fired burner with a maximum heat input capacity of 0.5 million British thermal units per hour (MMBtu/hr).

(m) One (1) truck loading system for bulk seed bags, identified as True Bulk Loadout, constructed in 2004, with a maximum capacity of 1,250 bushels per hour of soybeans, using baghouse 28A for industrial hygiene purposes, and exhausting to stack 28A, which vents inside the building.

(n) Forty-one (41) bulk storage bins, each constructed between 1983 and 1998, each with a maximum storage volume of approximately 3,000 bushels, and each may be loaded and unloaded using portable conveyors and equipment at a maximum capacity of 1,000 bushels per hour.

(o) Fugitive emissions from paved/unpaved roads and lots.

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, M159-25423-00010, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

B.8 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) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

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

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

(a) All terms and conditions of permits established prior to M159-25423-00010 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 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.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

C.12 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.13 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.14 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.15 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.16 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.17 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) 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) soybean receiving pit, identified as 1E, constructed prior to 1978, with a maximum receiving capacity of one hundred and eighty thousand (180,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

(b) Two (2) cleaners, identified as 3E, constructed prior to 1978, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

(c) Two (2) color sorters, identified as 9EA and 9EB, constructed in 2006, each with a maximum capacity of 15 tons of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

(d) One (1) color sorter, identified as 9EC, constructed in 2006, with a maximum capacity of 7.5 tons of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

(e) Three (3) gravity tables, identified as 5E, 6E and 7E, constructed prior to 1978, with a combined capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using three (3) cyclones, identified as 5A, 6A, 7A as controls, and exhausting to stacks 5A, 6A and 7A.

(f) Two (2) aspirators, (identified as 2E), constructed prior to 1978, with a maximum combined aspirating capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

(g) Four (4) storage bins, identified as Storage Bins, constructed in 2005, each with a maximum grain storage capacity of one thousand (1,000) bushels, using baghouse 11A for particulate control, and exhausting to stack 11A which vents inside the building.

(h) One (1) seed packaging area, identified as Packaging Tower, consisting of storage bins, scales, conveyors, mini-bulk bagging system, bulk bagging system and bag filters, constructed in 1992, and a dumping station, approved for construction in 2011, with a maximum throughput of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.

(i) Two (2) seed treaters, identified as Treater 1 and Treater 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 8A for particulate control, and exhausting to stack 8A which vents inside the building.

(j) Two (2) surge bins, identified as Surge Bin1 and Surge Bin 2, approved for construction in 2009, each with a maximum capacity of thirty thousand (30,000) pounds of soybean seeds per hour, using baghouse 9A for particulate control, and exhausting to stack 9A which vents inside the building.

(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):

(k) One (1) internal handling system, identified as Internal Handling, with a maximum capacity of sixty thousand (60,000) pounds of soybean seeds per hour, using baghouse 14A for particulate control, exhausting to stack 14A which vents outside the building, and consisting of the following equipment:

(1) Five (5) bulk holding bins, each constructed in 1983 (minibulk bins) and 1992 (paper bag bins), respectively;

(2) One (1) bucket elevator, constructed in 2005 and modified in 2009;

(3) One (1) batch weighing scale, constructed in 2005;

(4) Two (2) conveyor loading boxes, each constructed in 2002; and

(5) Basement legs and conveyors, each constructed in 1983.

(m) One (1) truck loading system for bulk seed bags, identified as True Bulk Loadout, constructed in 2004, with a maximum capacity of 1,250 bushels per hour of soybeans, using baghouse 28A for industrial hygiene purposes, and exhausting to stack 28A, which vents inside the building.

(n) Forty-one (41) bulk storage bins, each constructed between 1983 and 1998, each with a maximum storage volume of approximately 3,000 bushels, and each may be loaded and unloaded using portable conveyors and equipment at a maximum capacity of 1,000 bushels per hour.

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

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

D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

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

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

or

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

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

Facility	Process Weight (tons/hr)	Particulate Emission Limit (lbs/hr)
Soybean Receiving Pit (1E)	90	50.23
Cleaners (3E) (per cleaner)	15	25.16
Color Sorters (9EA and 9EB) (per color sorter)	15	25.16
Gravity Tables (5E, 6E and 7E) (per gravity table)	10	19.18
Aspirators (2E)	30	40.04
Storage Bins	30	40.04
Packaging Tower	30	40.04
Seed Treaters (both seed treaters combined)	15	25.16
Surge Bins (per surge bin)	30	40.04
Internal Handling	30	40.04
Bulk Storage Bins with Portable Conveyors	30	40.04

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

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

D.1.3 VOC Limit [326 IAC 8-1-6]

(a) The amount of VOC delivered to Treater 1, shall be less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, including coatings, dilution solvents, and cleaning solvents.

(b) The amount of VOC delivered to Treater 2, shall be less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, including coatings, dilution solvents, and cleaning solvents.

Compliance with these limits shall render the requirements of 326 IAC 8-1-6 (New Facilities; VOC Reduction Requirements) not applicable.

D.1.4 PSD Minor Limit [326 IAC 2-2]

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

(a) The existing soybean seed processing plant shall be limited to a throughput of less than 5,000,000 bushels (150,000 tons) of soybeans per 12 consecutive month period.

(b) Particulate Matter (PM) emissions for each of the soybean seed processing facilities shall be limited as follows:

Emission Units	Limited Soybean Throughput (tons/yr)	PM Emission Limit (lbs PM / ton Soybeans)	Limited PM Emissions (tons/yr)
Soybean receiving pit (1E)	150,000	0.035	2.63
Cleaners (3E)	150,000	0.750	56.25
Color sorters (9EA, 9EB, and 9EC)	150,000	0.061	13.73
Gravity tables (5E, 6E, and 7E)	150,000	0.750	56.25
Aspirators (2E)	150,000	0.030	2.25
Storage bins	150,000	0.025	1.88
Packaging Tower	150,000	0.061	4.58
Seed Treaters	150,000	0.061	4.58
Surge Bins	150,000	0.025	1.88
Internal Handling	150,000	0.061	4.58
Bulk Storage Bins with Portable Conveyors	150,000	0.035	2.63

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limit contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets, or by determining the VOC content using an alternate method approved by IDEM, Compliance and Enforcement Branch (CEB). IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.6 Record Keeping Requirement

(a) To document the compliance status with condition D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.3.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month and each compliance period.

(b) To document the compliance status with Condition D.1.4(a), the Permittee shall maintain records of the grain throughput for the entire source each month and each compliance period.

(c) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.7 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.3 and D.1.4(a) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	Monsanto Company
Address:	P.O. Box 367
City:	Windfall, Indiana 46036
Phone #:	317-945-7121
MSOP #:	M 159-25423-00010

I hereby certify that Monsanto Company is :

☐ still in operation.
☐ no longer in operation.

I hereby certify that Monsanto Company is :

☐ in compliance with the requirements of MSOP M 159-25423-00010.
☐ not in compliance with the requirements of MSOP M 159-25423-00010.

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

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

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

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

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

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

MSOP Quarterly Report

Source Name: Monsanto Company
Source Address: 908 North Independence Street, Windfall, Indiana 46076
MSOP No.: M 159-25423-00010
Facility: One (1) seed treater, identified as Treater 1
Parameter: VOC usage
Limit: Less than twenty-five (25.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

YEAR:_____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

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

MSOP Quarterly Report

Source Name: Monsanto Company
Source Address: 908 North Independence Street, Windfall, Indiana 46076
MSOP No.: M 159-25423-00010
Facility: One (1) seed treater, identified as Treater 2
Parameter: VOC usage
Limit: Less than twenty-five (25.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

YEAR:_____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

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

MSOP Quarterly Report

Source Name: Monsanto Company
Source Address: 908 North Independence Street, Windfall, Indiana 46076
MSOP No.: M 159-25423-00010
Facilities: Entire Source
Parameter: Soybean Throughput
Limit: Less than 5,000,000 bushels per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:_____

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attachment A: Emission Calculations
Summary Calculations

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Unlimited/Uncontrolled Potential Emissions for New Units (tons/year)				
Pollutant	Heated Treater Conveyor	True Bulk Loadout System	Portable Conveyors	**TOTAL**
PM	0.004	0.54	4.60	**5.15**
PM10	0.040	0.13	1.02	**1.20**
PM2.5	0.017	0.13	0.17	**0.32**
SO2	0.001	-	-	**0.001**
NOx	0.219	-	-	**0.22**
VOC	0.012	-	-	**0.012**
CO	0.184	-	-	**0.18**
GHGs as CO2e	264.40	-	-	**264.40**
Worst Single HAP	0.004 (hexane)	-	-	**0.004 (hexane)**
Total HAPs	0.004	-	-	**0.004**

Unlimited/Uncontrolled Potential Emissions (tons/year)														
Pollutant	Soybean Receiving	Internal Handling	Cleaners	Aspirator	Gravity Tables	Color Sorters	Soybean Packaging	Storage Bins	Surge Bins	Seed Treaters	Heated Treater Conveyor	True Bulk Loadout System	Portable Conveyors	**TOTAL**
PM	13.80	8.02	98.55	3.94	98.55	8.02	8.02	3.29	3.29	8.02	0.004	0.54	4.60	**258.62**
PM10	3.07	4.47	24.97	3.94	24.97	4.47	4.47	0.83	0.83	4.47	0.040	0.13	1.02	**77.67**
PM2.5	0.51	0.76	4.20	3.94	4.20	0.76	0.76	0.14	0.14	0.76	0.017	0.13	0.17	**16.52**
SO2	-	-	-	-	-	-	-	-	-	-	0.001	-	-	**0.001**
NOx	-	-	-	-	-	-	-	-	-	-	0.219	-	-	**0.22**
VOC	-	-	-	-	-	-	-	-	-	51.20	0.012	-	-	**51.21**
CO	-	-	-	-	-	-	-	-	-	-	0.184	-	-	**0.18**
GHGs as CO2e	-	-	-	-	-	-	-	-	-	-	264.40	-	-	**264.40**
Worst Single HAP	-	-	-	-	-	-	-	-	-	0.68 (methanol)	0.004 (hexane)	-	-	**0.68 (methanol)**
Total HAPs	-	-	-	-	-	-	-	-	-	0.77	0.004	-	-	**0.77**

Limited Potential Emissions (tons/year)														
Pollutant	Soybean Receiving	Internal Handling	Cleaners	Aspirator	Gravity Tables	Color Sorters	Soybean Packaging	Storage Bins	Surge Bins	[1]Seed Treaters	Heated Treater Conveyor	True Bulk Loadout System	Portable Conveyors	**TOTAL**
PM	2.63	4.58	56.25	2.25	56.25	13.73	4.58	1.88	1.88	4.58	0.004	0.25	2.63	**151.45**
PM10	0.59	2.55	14.25	2.25	14.25	7.65	2.55	0.47	0.47	2.55	0.040	0.06	0.59	**48.27**
PM2.5	0.10	0.44	2.40	2.25	2.40	1.31	0.44	0.08	0.08	0.44	0.017	0.06	0.10	**10.10**
SO2	-	-	-	-	-	-	-	-	-	-	0.001	-	-	**0.001**
NOx	-	-	-	-	-	-	-	-	-	-	0.219	-	-	**0.22**
VOC	-	-	-	-	-	-	-	-	-	50.00	0.012	-	-	**50.01**
CO	-	-	-	-	-	-	-	-	-	-	0.184	-	-	**0.18**
GHGs as CO2e	-	-	-	-	-	-	-	-	-	-	264.40	-	-	**264.40**
Worst Single HAP	-	-	-	-	-	-	-	-	-	0.68 (methanol)	0.004 (hexane)	-	-	**0.68 (methanol)**
Total HAPs	-	-	-	-	-	-	-	-	-	0.77	0.004	-	-	**0.77**

Limited and Controlled Potential Emissions (tons/year)														
Pollutant	Soybean Receiving	Internal Handling	Cleaners	Aspirator	Gravity Tables	Color Sorters	Soybean Packaging	Storage Bins	Surge Bins	[1]Seed Treaters	Heated Treater Conveyor	True Bulk Loadout System	Portable Conveyors	**TOTAL**
PM	0.026	0.046	0.563	0.023	5.625	0.137	0.046	0.019	0.019	0.046	0.004	0.0025	2.63	**9.18**
PM10	0.006	0.026	0.143	0.023	1.425	0.077	0.026	0.005	0.005	0.026	0.040	0.0006	0.59	**2.38**
PM2.5	0.001	0.004	0.024	0.023	0.240	0.013	0.004	0.001	0.001	0.004	0.017	0.0006	0.10	**0.43**
SO2	-	-	-	-	-	-	-	-	-	-	0.001	-	-	**0.001**
NOx	-	-	-	-	-	-	-	-	-	-	0.219	-	-	**0.22**
VOC	-	-	-	-	-	-	-	-	-	50.00	0.012	-	-	**50.01**
CO	-	-	-	-	-	-	-	-	-	-	0.184	-	-	**0.18**
GHGs as CO2e	-	-	-	-	-	-	-	-	-	-	264.40	-	-	**264.40**
Worst Single HAP	-	-	-	-	-	-	-	-	-	0.68 (methanol)	0.004 (hexane)	-	-	**0.68 (methanol)**
Total HAPs	-	-	-	-	-	-	-	-	-	0.77	0.004	-	-	**0.77**

Note 1: The source has agreed to limit the VOC emissions from each seed treater to less than 25.0 tons per year in order to avoid being subject to 326 IAC 8-1-6, because the PTE of VOC is based on assumptions that could not be verified by vendor sheets.

Attachment A: Emission Calculations
Particulate from Soybean Receiving Pit

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Pollutant	Receiving Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	90	0.035	13.8	99%	0.14
PM_{10}	90	0.0078	3.07	99%	0.031
$PM_{2.5}$	90	0.0013	0.51	99%	0.005

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving by Hopper Truck, SCC 3-02-005-52). March 2003

Methodology
Uncontrolled PTE = Receiving capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Limited Particulate from Soybean Receiving Pit

Grain	[1]bushels/year	[2]lbs / bushel	**Grain Throughput (tons/year)**
Wheat and Soybeans processed	5,000,000	60	150,000

Note 1: Total limited amount of grain received and shipped per year equals 5.0 MM bushels soybeans.
Note 2: Assumes 60 lb/bushel for Wheat and Soy

Pollutant	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	150,000	0.035	2.6	99%	0.026
PM_{10}	150,000	0.0078	0.6	99%	0.006
$PM_{2.5}$	150,000	0.0013	0.1	99%	0.001

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving by Hopper Truck, SCC 3-02-005-52). March 2003

Methodology
Limted PTE = Limited Grain Throughput (tons/yr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Attachment A: Emission Calculations
Particulate from Internal Handling

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Pollutant	Handling Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	30	0.061	8.02	99%	0.080
PM_{10}	30	0.034	4.47	99%	0.045
$PM_{2.5}$	30	0.0058	0.76	99%	0.008

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

Methodology
Uncontrolled PTE = Handling capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Limited Particulate from Internal Handling

Pollutant	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	150,000	0.061	4.58	99%	0.046
PM_{10}	150,000	0.034	2.55	99%	0.026
$PM_{2.5}$	150,000	0.0058	0.44	99%	0.004

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

Methodology
Limted PTE = Limited Grain Throughput (tons/yr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Attachment A: Emission Calculations
Particulate from Cleaners

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Pollutant	Cleaning Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	30	0.75	98.55	99%	0.99
PM_{10}	30	0.19	24.97	99%	0.25
$PM_{2.5}$	30	0.032	4.20	99%	0.04

* Emission factors from AP-42, Table 9.9.1-1 (Grain Cleaning, Internal Vibrating, SCC 3-02-005-37).
Methodology
Uncontrolled PTE = Cleaning capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Limited Particulate from Cleaners

Pollutant	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	150,000	0.75	56.25	99%	0.56
PM_{10}	150,000	0.19	14.25	99%	0.14
$PM_{2.5}$	150,000	0.032	2.40	99%	0.02

* Emission factors from AP-42, Table 9.9.1-1 (Grain Cleaning, Internal Vibrating, SCC 3-02-005-37).
Assume a cyclone control of 90% to get uncontrolled emission factors from AP-42. March 2003
Methodology
Limted PTE = Limited Grain Throughput (tons/yr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Attachment A: Emission Calculations
Particulate from Aspirator

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Pollutant	Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Cyclone Control Efficiency	PTE After Controls (tons/yr)
PM	30	0.03	3.94	99%	0.04
PM_{10}**	30	0.03	3.94	99%	0.04
$PM_{2.5}$**	30	0.03	3.94	99%	0.04

* Emission factors from AP-42, Table 9.9.1-1 (Rice Mills, Aspirator SCC 3-02-007-77). Assume a
*** Assume PM emissions = PM10 emissions = PM2.5 emissions

Methodology
Uncontrolled PTE = Capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Limited Particulate from Aspirator

Pollutant	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Cyclone Control Efficiency	PTE After Controls (tons/yr)
PM	150,000	0.03	2.25	99%	0.02
PM_{10}**	150,000	0.03	2.25	99%	0.02
$PM_{2.5}$**	150,000	0.03	2.25	99%	0.02

* Emission factors from AP-42, Table 9.9.1-1 (Rice Mills, Aspirator SCC 3-02-007-77). Assume a
*** Assume PM emissions = PM10 emissions = PM2.5 emissions

Methodology
Limted PTE = Limited Grain Throughput (tons/yr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Attachment A: Emission Calculations
Particulate from Gravity Tables

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Pollutant	Sorting Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Cyclone Control Efficiency***	PTE After Controls (tons/yr)
PM	30	0.75	98.55	90%	9.86
PM_{10}	30	0.19	24.97	90%	2.50
$PM_{2.5}$	30	0.032	4.20	90%	0.42

* Emission factors from AP-42, Table 9.9.1-1 (Grain Cleaning, Internal Vibrating, SCC 3-02-005-37).
Methodology
Uncontrolled PTE = Sorting capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Limited Particulate from Gravity Tables

Pollutant	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Cyclone Control Efficiency***	PTE After Controls (tons/yr)
PM	150,000	0.75	56.25	90%	5.63
PM_{10}	150,000	0.19	14.25	90%	1.43
$PM_{2.5}$	150,000	0.032	2.40	90%	0.24

* Emission factors from AP-42, Table 9.9.1-1 (Grain Cleaning, Internal Vibrating, SCC 3-02-005-37).
Assume a cyclone control of 90% to get uncontrolled emission factors from AP-42. March 2003
Methodology
Limted PTE = Limited Grain Throughput (tons/yr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Attachment A: Emission Calculations
Particulate from Color Sorters

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Pollutant	Capacity of Sorters 9 EA and 9EB (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	15	0.061	8.02	99%	0.080
PM_{10}	15	0.034	4.47	99%	0.045
$PM_{2.5}$	15	0.0058	0.76	99%	0.008

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

Methodology
Uncontrolled PTE = Handling capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Pollutant	Capacity of Sorter 9 EC (tons/hr)	Emission Factor* (lbs/ton)	Before Controls (tons/yr)	Baghouse Control Efficiency	After Controls (tons/yr)
PM	7.5	0.061	2.00	99%	0.020
PM_{10}	7.5	0.034	1.12	99%	0.011
$PM_{2.5}$	7.5	0.0058	0.19	99%	0.002

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

Methodology
Uncontrolled PTE = Handling capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Limited Particulate from Color Sorters

Pollutant	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	150,000	0.061	13.73	99%	0.137
PM_{10}	150,000	0.034	7.65	99%	0.077
$PM_{2.5}$	150,000	0.0058	1.31	99%	0.013

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

Methodology
Limted PTE = Limited Grain Throughput (tons/yr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Attachment A: Emission Calculations
Particulate from Packaging

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Pollutant	Packaging Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Baghouse Control Efficiency	After Controls (tons/yr)
PM	30	0.061	8.02	99%	0.08
PM_{10}	30	0.034	4.47	99%	0.04
$PM_{2.5}$	30	0.0058	0.76	99%	0.01

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

Methodology
Uncontrolled PTE = Packaging capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Limited Particulate from Packaging

Pollutant	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls** (tons/yr)	Baghouse Control Efficiency	After Controls (tons/yr)
PM	150,000	0.061	4.58	99%	0.05
PM_{10}	150,000	0.034	2.55	99%	0.03
$PM_{2.5}$	150,000	0.0058	0.44	99%	0.00

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

Methodology
Limted PTE = Limited Grain Throughput (tons/yr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Attachment A: Emission Calculations
Particulate from Storage Bins

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Pollutant	Maximum Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	30	0.025	3.29	99%	0.033
PM_{10}	30	0.0063	0.83	99%	0.008
$PM_{2.5}$	30	0.0011	0.14	99%	0.001

* Emission factors from AP-42, Table 9.9.1-1 (Storage bin (vent) (SCC 3-02-005-40)). March 2003

Methodology
Uncontrolled PTE = Maximum capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Limited Particulate from Storage Bins

Pollutant	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	150,000	0.025	1.88	99%	0.019
PM_{10}	150,000	0.0063	0.47	99%	0.005
$PM_{2.5}$	150,000	0.0011	0.08	99%	0.001

* Emission factors from AP-42, Table 9.9.1-1 (Storage bin (vent) (SCC 3-02-005-40)). March 2003

Methodology
Limted PTE = Limited Grain Throughput (tons/yr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Attachment A: Emission Calculations
Particulate from Surge Bins

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Pollutant	Maximum Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	30	0.025	3.29	99%	0.033
PM_{10}	30	0.0063	0.83	99%	0.008
$PM_{2.5}$	30	0.0011	0.14	99%	0.001

* Emission factors from AP-42, Table 9.9.1-1 (Storage bin (vent) (SCC 3-02-005-40)). March 2003

Methodology
Uncontrolled PTE = Maximum capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Limited Particulate from Surge Bins

Pollutant	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	150,000	0.025	1.88	99%	0.019
PM_{10}	150,000	0.0063	0.47	99%	0.005
$PM_{2.5}$	150,000	0.0011	0.08	99%	0.001

* Emission factors from AP-42, Table 9.9.1-1 (Storage bin (vent) (SCC 3-02-005-40)). March 2003

Methodology
Limted PTE = Limited Grain Throughput (tons/yr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Attachment A: Emission Calculations
Particulate from Treating

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Pollutant	Treating Capacity (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	30	0.061	8.02	99%	0.080
PM_{10}	30	0.034	4.47	99%	0.045
$PM_{2.5}$	30	0.0058	0.76	99%	0.008

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

Methodology
Uncontrolled PTE = Treating capacity (tons/hr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Limited Particulate from Treating

Pollutant	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)	Baghouse Control Efficiency	PTE After Controls (tons/yr)
PM	150,000	0.061	4.58	99%	0.046
PM_{10}	150,000	0.034	2.55	99%	0.026
$PM_{2.5}$	150,000	0.0058	0.44	99%	0.004

* Emission factors from AP-42, Table 9.9.1-1 (Grain Receiving, Internal Handling, SCC 3-02-005-30). March 2003

Methodology
Limted PTE = Limited Grain Throughput (tons/yr)* PM emission factor (lbs/hr)* 1 ton/2000 lbs *8760 hr/yr
Controlled PTE = uncontrolled PTE * (1-control efficiency)

Attachment A: Emissions Calculations
Seed Treaters - VOC PTE

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Conversions

ctw =	100	lbs (cwt = hundredweight = 100 lb)
oz / gallons =	128	oz/gallon
lbs / bu =	60	lbs/bu
ctw =	1.667	bu

Maximum Hourly Throughpu

Maximum Hourly Throughput =	1000	bu/hr (throughput of both treaters together)
Maximum Annual Throughput =	262800	tons/yr (throughput of both treaters together)

VOC Emissions from Seed Treaters

Seed Additive	Constituent	% VOC/HAP by Weight	Density (lb/gal)	[1] VOC/HAP Content (lb/gal of coating)	Maximum Throughput (tons seed/yr)	[2] Application Rate (oz of treatment / ctw)	Application Rate (oz of treatment / tons)	Annual Capacity (gal/year)	Uncontrolled VOC PTE (tons/yr)	Uncontrolled HAP PTE (tons/yr)
Allegiance FL (Metalaxyl)	VOC	7.5%	9.2	0.69	262,800	0.8	16	32,850	11.33	-
Diamir (VOC)	VOC	11.0%	9.1	1.00	262,800	0.4	8	16,425	8.22	-
Diamir (Toluene)	HAP	0.1%	9.1	0.01	262,800	0.4	8	16,425	-	0.07
Gaucho 600	VOC	7.5%	10.3	0.77	262,800	1.6	32	65,700	25.38	-
N-Hibit Gold CST(Harpin)	VOC	0.0%	3.9	0.00	262,800	.25 oz./ ctw*	-	-	-	-
[3]Custom Color Orange	VOC	1.0%	11.0	0.11	262,800	2.4	48	98,550	5.42	-
[3]Color Film Clear	VOC	5.0%	8.3	0.42	262,800	0.1	2	4,106	0.85	-
Color Film Clear (Methanol)	HAP	4.0%	8.3	0.33	262,800	0.1	2	4,106	-	0.68
Color Film Clear (Formaldehyde)	HAP	0.05%	8.3	0.00	262,800	0.1	2	4,106	-	0.01
									51.20	**0.77**
							[4]Limited total PTE in tons/yr		**Less Than 50.00**	

* *N-Hibit is a wettable dry granule*

Methods:

Note 1. VOC content in lb VOC per gallon of coating was not given based on MSDS sheets. Therefore the lb VOC/gal of coating was estimated based on MSDS sheets, or similar materials where the lb VOC/gal of coating was provided.
Note 2. Application Rate provided by source
Note 3: Vender memorandum for Custom color orange estimates the VOC content at less than 1% and for Color Film Clear at less than 5%.

Note 4: The source has agreed to limit the VOC emissions from each seed treater to less than 25.0 tons per year in order to avoid being subject to 326 IAC 8-1-6, because the PTE of VOC is based on assumptions that could not be verified by vendor sheets.
Emission factor = Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Annual Capacity in tons/year = Grain Throughput in tons/year.
Annual Capacity in gal/year = Annual capacity in tons/year * seed additive usage in ounce/ton * (1 gal / 128 ounces)
Potential VOC or HAP Emissions in Tons per Year = (1 ton/2000 lbs) = Annual Capacity in gal/year * Emission factor in lb/gal * (1 ton /2000 lbs)

Attachment A: Emissions Calculations
Natural Gas Combustion Only
Capacity <100 MMBtu/hr
Heated Treater Conveyor

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
0.50	1000	4.38
0.50		**4.38**

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	0.004	0.040	0.017	0.001	0.22	0.012	0.18

*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	4.599E-06	2.628E-06	1.643E-04	3.942E-03	7.446E-06	1.095E-06	2.409E-06	3.066E-06	8.322E-07	4.599E-06

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

Potential to Emit Total HAPs (tons/year) = 0.004

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Greenhouse Gases (GHGs)	Greenhouse Gas (GHG)		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	262.80	0.01	0.00
Summed Potential Emissions in tons/yr	262.81		
CO2e Total in tons/yr	264.40		

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 N20 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 = Cabon Dioxide
CH4 = Methane
N2O = Nitrous Oxide
CO2e = CO2 equivalent emissions

Attachment A: Emission Calculations
Particulate from True Bulk Loadout

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Maximum Hourly Grain Throughput

Grain	bushels/hour	lbs / bushel	Maximum Grain Throughput (tons/hour)
Soybeans	1,250	60	37.5

The True Bulk Loadout consists of placing bulk seed bags into a hopper that feeds a conveyor that loads the bulk bags onto trucks. To estimate particulate emissions, emission factors for feed shipping (AP-42, Table 9.9.1-2) are used, since animal feed is typically shipped in bags.

Unlimited Particulate from True Bulk Loadout

Pollutant	Maximum Capacity (tons/hour)	Emission Factor* (lbs/ton)	Unlimited PTE Before Controls (tons/yr)	Baghouse Control Efficiency	Unlimited PTE After Controls (tons/yr)
PM	37.5	0.0033	0.54	99%	0.0054
PM_{10}	37.5	0.0008	0.13	99%	0.0013
$PM_{2.5}$	37.5	0.0008	0.13	99%	0.0013

Limited Particulate from True Bulk Loadout

Pollutant	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	Limited PTE Before Controls (tons/yr)	Baghouse Control Efficiency	Limited PTE After Controls (tons/yr)
PM	150,000	0.0033	0.248	99%	0.0025
PM_{10}	150,000	0.0008	0.060	99%	0.0006
$PM_{2.5}$	150,000	0.0008	0.060	99%	0.0006

Methodology
* Emission factors from AP-42, Table 9.9.1-2 (Feed Shipping (SCC 3-02-008-03)). March 2003
Unlimited PTE Before Controls (tons/year) = [Maximum Capacity (tons/hour)] * [Emission Factor (lbs/hr)] * [ton/2000 lbs] * [8760 hours/year]
Unlimited PTE After Controls (tons/year) = [Unlimited PTE Before Controls (tons/year)] * [1 - Baghouse Control Efficiency]
Limited PTE Before Controls (tons/year) = [Limited Grain Throughput (tons/year)] * [Emission Factor (lbs/hr)] * [ton/2000 lbs]
Limited PTE After Controls (tons/year) = [Limited PTE Before Controls (tons/year)] * [1 - Baghouse Control Efficiency]

Attachment A: Emission Calculations
Particulate from Loading and Unloading 41 Bulk Storage Bins with Portable Conveyors

Company Name: Monsanto Global Seed Company
Source Address: 908 N. Independence Drive, Windfall, IN 46076
Permit No: 159-25423-00010
Notice-Only Change No.: 159-30707-00010
Reviewer: Nathan C. Bell

Maximum Hourly Grain Loading/Unloading Rate for Each Portable Conveyor

Grain	bushels/hour	lbs / bushel	Maximum Grain Throughput (tons/hour)
Soybeans	1,000	60	30.0

The portable conveyors can be used to unload hopper trucks and load the 41 bulk storage bins. To estimate particulate emissions, emission factors for grain receiving by opper truck (AP-42, Table 9.9.1-1) are used.

Unlimited Particulate from Loading/Unloading 41 Bulk Storage Bins with Portable Conveyors

Pollutant	Maximum Loading/Unloading Capacity (tons/hr)	Loading/Unloading Emission Factor* (lbs/ton)	Unlimited PTE of Grain Loading/ Unloading (tons/yr)
PM	30.0	0.0350	4.60
PM_{10}	30.0	0.0078	1.02
$PM_{2.5}$	30.0	0.0013	0.17

Limited Particulate from Loading/Unloading 41 Bulk Storage Bins with Portable Conveyors

Pollutant	Limited Grain Throughput (tons/year)	Emission Factor* (lbs/ton)	Limited PTE of Grain Loading/ Unloading (tons/yr)
PM	150,000	0.0350	2.625
PM_{10}	150,000	0.0078	0.585
$PM_{2.5}$	150,000	0.0013	0.098

Methodology
* Emission factors from AP-42, Table 9.9.1-1 (Grain receiving - Hopper truck (SCC 3-02-005-52)). March 2003
Unlimited PTE (tons/year) = [Maximum Capacity (tons/hour)] * [Emission Factor (lbs/hr)] * [ton/2000 lbs] * [8760 hours/year]
Limited PTE (tons/year) = [Limited Grain Throughput (tons/year)] * [Emission Factor (lbs/hr)] * [ton/2000 lbs]

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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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: Craig Weitbrecht
Monsanto Company
908 North Independence St
Windfall, IN 46076

DATE: August 23, 2011

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

SUBJECT: Final Decision
MSOP
159-30707-00010

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

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

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

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	DPABST 8/23/2011 Monsanto Company 159-30707-00010(Final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Craig Weitbrecht Monsanto Company 908 N Independence St Windfall IN 46076 (Source CAATS) (CONFIRM DELIVERY)									
2		Shelly & J. Acres 1280 S 400 W Tipton IN 46072 *(Affected Party)*									
3		Ms. Jane Harper 285 W 100 N Tipton IN 46072 *(Affected Party)*									
4		Tipton County Commissioners 101 East Jefferson Street Tipton IN 46072 *(Local Official)*									
5		Tipton County Health Department Tipton Co Court House, 101 E Jefferson St Tipton IN 46072 *(Health Department)*									
6		Windfall Town Council P.O. Box 486 Windfall IN 46076 *(Local Official)*									
7		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 *(Affected Party)*									
8											
9											
10											
11											
12											
13											
14											
15											

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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