



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 17, 2012

RE: Consolidated Grain & Barge, Co / 129-31275-00014

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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Part 70 Operating Permit OFFICE OF AIR QUALITY

**Consolidated Grain & Barge Co.
2801 Bluff Road
Mt. Vernon, Indiana 47620**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

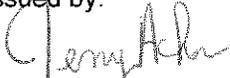
Operation Permit No.: T129-31275-00014	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 17, 2012 Expiration Date: September 17, 2017

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary grain merchandising plant.

Source Address:	2801 Bluff Road, Mt. Vernon, Indiana 47620
General Source Phone Number:	(812) 218-5240
SIC Code:	5153
County Location:	Posey
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Area Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

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

- (a) One (1) North Merchandising House
 - (1) One (1) Grain Storage Ring/Pad, approved in 2002 for construction, identified as P9B, with a capacity of 1 million bushel pile (30,000 tons of grain).
 - (2) One (1) Overhead Totally Enclosed Conveyor, approved in 2002 for construction, identified as P8B, with a maximum capacity of 500 tons per hour.
 - (3) Receiving, approved in 2000 for construction, identified as P7, with a maximum capacity of 336 tons of grain per hour.
 - (4) Conveying, approved in 2000 for construction, identified as P8, with a maximum capacity of 336 tons of grain per hour.
 - (5) Loadout, approved in 2000 for construction, identified as P9, with a maximum capacity of 375 tons of grain per hour.
 - (6) Loadout, approved in 2000 for construction, identified as Hopper Truck P9B, with a maximum capacity of 375 tons of grain per hour.
- (b) One (1) Truck Only Receiving Area, installed in the first quarter of 1978, identified as P1, with a maximum capacity of 1,050 tons of grain per hour, including receiving pits P1A, P1B, with emissions controlled by baghouse C-1 and exhausted to Stack S1, and receiving pit P1C, approved in 2001 for construction, with emissions controlled by baghouse C-3 and exhausted to Stack S3.
- (c) One (1) Truck & Rail Receiving Area, installed in the first quarter of 1978, identified as P2, with a maximum capacity of 420 tons of grain per hour.

- (d) One (1) Grain Storage/Handling Area, installed in 1979, identified as P3, with a maximum capacity of 1,260 tons of grain per hour, with emissions controlled by baghouse C-2 and exhausted to stack S-2.
- (e) One (1) natural gas-fired grain dryer, known as P4, exhausted to S-4, approved in 2012 for construction, rated at 46.0 million British thermal units per hour (mmBtu/hr), capacity: 141.0 tons of grain per hour.
- (f) One (1) natural gas-fired column grain dryer, approved in 2003 for construction, identified as P4A, rated at 21.6 million British thermal units per hour, exhausting to Stack S-5, with a maximum capacity of 105 tons of grain per hour.
- (g) One (1) Barge Loadout Area, installed in the first quarter of 1978, identified as P5, with emissions controlled by a telescoping spout, with a maximum capacity of 500 tons of grain per hour.
- (h) One (1), Truck Loadout Area, installed in the first quarter of 1978, identified as P6A, with emissions controlled by a spout extension, with a maximum capacity of 336 tons of grain per hour.
- (i) One (1) enclosed reclaim conveyor leg, for rail or truck loadout, approved in 2003 for construction, identified as P6B, equipped with a bulk weigh station at its discharge, with a maximum capacity of 850 tons of grain per hour.
- (j) One (1) enclosed conveyor leg, approved in 2005 for construction, identified as P1D, with a maximum capacity of 700 tons of grain per hour, controlled by baghouse C-1.
- (k) One (1) enclosed grain storage conveyor, approved in 2009 for construction, identified as P10A, with a maximum capacity of 336 tons of grain per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(14)]

This stationary source consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements:

- (a) One (1) Grain Storage Bin, approved in 2009 for construction, identified as P10, with a maximum capacity of 18,228 tons of grain. [326 IAC 6-3-2]
- (b) Paved roads and parking lots with public access. [326 IAC 6-4]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T129-31275-00014, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

-
- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
 - (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)] [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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (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.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T129-31275-00014 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b) or (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 Part 70 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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 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.3 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.4 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.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

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

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.9 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] [40 CFR 64] [326 IAC 3-8]

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (b) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (c) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

C.13 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [40 CFR 64] [326 IAC 3-8] [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (I) 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.
- (II)
 - (a) *CAM Response to excursions or exceedances.*

- (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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. 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). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or 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.
 - (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
 - (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
 - (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
 - (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
 - (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems;
or

- (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or record keeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM record keeping requirements.*
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
 - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable record keeping requirements.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (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. Support information includes the following:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) North Merchandising House
 - (1) One (1) Grain Storage Ring/Pad, approved in 2002 for construction, identified as P9B, with a capacity of 1 million bushel pile (30,000 tons of grain).
 - (2) One (1) Overhead Totally Enclosed Conveyor, approved in 2002 for construction, identified as P8B, with a maximum capacity of 500 tons per hour.
 - (3) Receiving, approved in 2000 for construction, identified as P7, with a maximum capacity of 336 tons of grain per hour.
 - (4) Conveying, approved in 2000 for construction, identified as P8, with a maximum capacity of 336 tons of grain per hour.
 - (5) Loadout, approved in 2000 for construction, identified as P9, with a maximum capacity of 375 tons of grain per hour.
 - (6) Loadout, approved in 2000 for construction, identified as Hopper Truck P9B, with a maximum capacity of 375 tons of grain per hour.
- (b) One (1) Truck Only Receiving Area, installed in the first quarter of 1978, identified as P1, with a maximum capacity of 1,050 tons of grain per hour, including receiving pits P1A, P1B, with emissions controlled by baghouse C-1 and exhausted to Stack S1, and receiving pit P1C, approved in 2001 for construction, with emissions controlled by baghouse C-3 and exhausted to Stack S3.
- (c) One (1) Truck & Rail Receiving Area, installed in the first quarter of 1978, identified as P2, with a maximum capacity of 420 tons of grain per hour.
- (d) One (1) Grain Storage/Handling Area, installed in 1979, identified as P3, with a maximum capacity of 1,260 tons of grain per hour, with emissions controlled by baghouse C-2 and exhausted to stack S-2.
- (e) One (1) natural gas-fired grain dryer, known as P4, exhausted to S-4, approved in 2012 for construction, rated at 46.0 million British thermal units per hour (mmBtu/hr), capacity: 141.0 tons of grain per hour.
- (f) One (1) natural gas-fired column grain dryer, approved in 2003 for construction, identified as P4A, rated at 21.6 million British thermal units per hour, exhausting to Stack S-5, with a maximum capacity of 105 tons of grain per hour.
- (g) One (1) Barge Loadout Area, installed in the first quarter of 1978, identified as P5, with emissions controlled by a telescoping spout, with a maximum capacity of 500 tons of grain per hour.
- (h) One (1), Truck Loadout Area, installed in the first quarter of 1978, identified as P6A, with emissions controlled by a spout extension, with a maximum capacity of 336 tons of grain per hour.

- (i) One (1) enclosed reclaim conveyor leg, for rail or truck loadout, approved in 2003 for construction, identified as P6B, equipped with a bulk weigh station at its discharge, with a maximum capacity of 850 tons of grain per hour.
 - (j) One (1) enclosed conveyor leg, approved in 2005 for construction, identified as P1D, with a maximum capacity of 700 tons of grain per hour, controlled by baghouse C-1.
 - (k) One (1) enclosed grain storage conveyor, approved in 2009 for construction, identified as P10A, with a maximum capacity of 336 tons of grain per hour.
- Insignificant Activities:**
- (a) One (1) Grain Storage Bin, approved in 2009 for construction, identified as P10, with a maximum capacity of 18,228 tons of grain. [326 IAC 6-3-2]
- (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 2-7-5(1)]

D.1.1 Prevention of Significant Deterioration (PSD) Minor PM and PM₁₀ Emission Limits [326 IAC 2-2]

- (a) The annual grain throughput to the grain merchandising emission units, including the particulate emissions shall not exceed the limits in the table below:

Process/Emission Units	Throughput Limits (ton/yr)	PM Emissions Limit (lb/ton)	PM ₁₀ Emissions Limit (lb/ton)	Control ID
Truck Receiving and Receiving Pit (P1A & P1B)	1,250,000	0.18	0.059	Baghouse C-1
Truck Receiving and Receiving Pit (P1C)	1,250,000	0.18	0.059	Baghouse C-3
Conveyor Leg (P1D)	2,100,000	0.061	0.034	Baghouse C-1
Rail/HB and Hopper Truck Receiving (P2)	1,576,000	0.035	0.0078	n/a
Grain Handling (P3)	2,100,000	0.061	0.034	Baghouse C-2
Grain Drying process (Dryer P4)	225,000	0.22	0.055	n/a
Grain Drying process (Dryer P4A)	400,000	0.22	0.055	n/a
Grain Barge Loadout (P5)	1,600,000	0.016	0.0040	Telescoping Spout
Grain Truck Loadout (P6A)	1,300,000	0.086	0.029	Spout Extension
Enclosed Reclaim Conveyor Leg (P6B)	600,000	0.061	0.034	n/a
North Merchandising House Receiving (P7)	280,000	0.035	0.0078	n/a
North Merchandising House Conveying (P8)	280,000	0.061	0.034	n/a
North Merchandising House Enclosed Conveying (P8B)	280,000	0.061	0.034	n/a
North Merchandising House Loadout (P9)	280,000	0.086	0.029	n/a
North Merchandising House Loadout (Hopper Truck - P9B)	280,000	0.086	0.029	n/a
Grain Storage Bin Conveyor (P10A)	400,000	0.061	0.034	n/a

Each throughput limit shall be based on a twelve (12) month period, with compliance determined at the end of each month. Compliance with these particulate emission limits shall limit the PM and PM₁₀ emissions from the source to less than 250 tons per twelve (12) months, each, which renders the requirements of 326 IAC 2-2, Prevention of Significant Deterioration (PSD) not applicable.

D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]

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

Process/Emission Units	Process Weight Rate (ton/hr)	PM Emissions Limit (lb/hr)
Truck Receiving and Receiving Pit (P1A & P1B)	1,050	78.2
Truck Receiving and Receiving Pit (P1C)	1,050	78.2
Conveyor Leg (P1D)	700	73.0
Rail/HB and Hopper Truck Receiving (P2)	420	67.0
Grain Storage/ Handling (P3)	1,260	80.6
Grain Drying process (Dryer P4)	141	54.79
Grain Drying process (Dryer P4A)	105	51.8
Grain Barge Loadout (P5)	500	69.0
Grain Truck Loadout (P6A)	336	64.3
Enclosed Reclaim Conveyor Leg (P6B)	850	75.5
North Merchandising House Receiving (P7)	336	64.3
North Merchandising House Conveying (P8)	336	64.3
North Merchandising House Enclosed Conveying (P8B)	500	69.0
North Merchandising House Loadout (P9)	375	65.6
North Merchandising House Loadout (Hopper Truck - P9B)	375	68.0
Grain Storage Bin (P10)	12.5	22.3
Grain Storage Bin Conveyor (P10A)	336	64.3

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

$$E = 4.1 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}$$

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

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

- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), when the process weight rate exceeds two hundred (200) tons per hour, the allowable emissions may exceed that shown in the table in 326 IAC 6-3-2(e) provided the concentration of particulate in the discharge gases to the atmosphere is less than one tenth (0.10) pound per one thousand (1,000) pounds of gases.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements

D.1.4 Particulate Control

- (a) The baghouses, telescoping spouts and spout extensions for particulate control shall be in operation or in place at all times when P1A, P1B, P1C, P3, P5 and P6A, are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM and PM₁₀ testing for baghouse C-1 used in conjunction with the Truck Only Receiving Area (P-1), including Receiving Pits (P1A & P1B) and Conveyor Leg (P1D), baghouse C-3 used in conjunction with the Receiving Pit (P1C), and baghouse C-2 used in conjunction with the Grain Storage/Handling Areas (P3) utilizing methods approved by the commissioner. PM₁₀ includes filterable and condensable PM.

Testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligations with regard to the testing required by this condition.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Visible Emissions Notations [40 CFR 64] [326 IAC 3-8]

- (a) Visible emission notations of the stacks exhausts from baghouse C-1 controlling Truck Only Receiving, identified as P-1 (P1A & P1B) and Conveyor Leg (P1D), baghouse C-2 controlling Grain Storage/Handling Areas, identified as P3 and baghouse C-3 controlling Receiving Pit, identified as P1C, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions and Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition.

D.1.7 Baghouses Parametric Monitoring [40 CFR 64] [326 IAC 3-8]

- (a) The Permittee shall record the pressure drop across baghouse C-1 controlling the Truck Only Receiving Area, identified as P-1 (P1A & P1B) and Conveyor Leg (P1D); baghouse C-2, controlling Grain Storage/Handling Areas, identified as P3, and baghouse C-3 controlling Receiving Pit, identified as P1C, at least once per day when the respective emission unit is in operation.
- (b) When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 1.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition.
- (c) The instruments used for determining the pressure shall comply with Section C - Instrument Specifications of this permit, and shall be calibrated or replaced at least once every six (6) months.

D.1.8 Broken or Failed Bag Detection - Single Compartment Baghouses [40 CFR 64] [326 IAC 3-8]

In the event that bag failure has been observed:

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

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

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.6, the Permittee shall maintain a daily record of visible emission notations of the stacks exhausts from baghouse C-1 controlling Truck Only Receiving, identified as P-1 (P1A & P1B) and Conveyor Leg (P1D), baghouse C-2 controlling Grain Storage/Handling Areas, identified as P3 and baghouse C-3 controlling Receiving Pit, identified as P1C. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain a daily record of the pressure drop across each of the baghouses controlling the Truck Only Receiving, identified as P-1 (P1A & P1B) and Conveyor Leg (P1D), Receiving Pit, identified as P1C, and the Grain Storage/Handling Areas, identified as P3. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.1.1, the Permittee shall maintain monthly records of the grain throughput to the merchandising emission units.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

D.1.10 Reporting Requirements

A monthly summary of the information to document the compliance status with Condition D.1.1, shall be submitted quarterly using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of the each calendar quarter. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Consolidated Grain & Barge Co.
Source Address: 2801 Bluff Road, Mt. Vernon, Indiana 47620
Part 70 Permit No.: T129-31275-00014

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify): _____
- Report (specify): _____
- Notification (specify): _____
- Affidavit (specify): _____
- Other (specify): _____

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Consolidated Grain & Barge Co.
Source Address: 2801 Bluff Road, Mt. Vernon, Indiana 47620
Part 70 Permit No.: T129-31275-00014

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), no later than four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance and Enforcement Branch); and
 - The Permittee must submit notice in writing or by facsimile no later than two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency

Describe the cause of the Emergency

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

Page 2 of 2

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Submittal Report

Source Name: Consolidated Grain & Barge Co.
 Source Address: 2801 Bluff Road, Mt. Vernon, Indiana 47620
 Part 70 Permit No.: T129-31275-00014
 Facilities: As listed in below table
 Parameter: PM and PM₁₀
 Limits: Condition D.1.1 - Shall not exceed the grain throughput limits as listed in below table in tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

MONTH: _____ YEAR: _____

Emission Unit	Grain Throughput Limits (tons/year)	Grain Throughput Tons This Month (tons)	Grain Throughput Tons Previous 11 Months (tons)	Grain Throughput Tons 12 Month Total (tons)
Truck Receiving and Receiving Pit (P1A & P1B)	1,250,000			
Truck Receiving and Receiving Pit (P1C)	1,250,000			
Conveyor Leg (P1D)	2,100,000			
Rail/HB and Hopper Truck Receiving (P2)	1,576,000			
Grain Handling (P3)	2,100,000			
Grain Drying process (Dryer P4)	225,000			
Grain Drying process (Dryer P4A)	400,000			
Grain Barge Loadout (P5)	1,600,000			
Grain Truck Loadout (P6A)	1,300,000			
Enclosed Reclaim Conveyor Leg (P6B)	600,000			
North Merchandising House Receiving (P7)	280,000			
North Merchandising House Conveying (P8)	280,000			
North Merchandising House Enclosed Conveying (P8B)	280,000			
North Merchandising House Loadout (P9)	280,000			
North Merchandising House Loadout (Hopper Truck - P9B)	280,000			
Grain Storage Bin Conveyor (P10A)	400,000			

- No deviation occurred in this quarter.
- Deviations 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**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Consolidated Grain & Barge Co.
Source Address: 2801 Bluff Road, Mt. Vernon, Indiana 47620
Part 70 Permit No.: T129-31275-00014

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C – General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked “No deviations occurred this reporting period”.

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Source Modification and Part 70 Operating Permit

Source Background and Description

Source Name:	Consolidated Grain & Barge, Co.
Source Location:	2801 Bluff Road, Mt. Vernon, Indiana 47620
County:	Posey
SIC Code:	5153
Significant Source Modification No.:	T129-31795-00014
Part 70 Operating Permit No.:	T129-31275-00014
Permit Reviewer:	Kimberly Cottrell

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Consolidated Grain & Barge, Co. relating to the operation of a stationary grain merchandising plant. On December 16, 2011, Consolidated Grain & Barge, Co. submitted an application to the OAQ requesting to renew its operating permit. Consolidated Grain & Barge, Co. was issued its first Part 70 Administrative Operating Permit (T129-24928-00014) on September 20, 2007. The Source Definition has been updated as part of this permitting action; therefore, Consolidated Grain & Barge, Co. is obtaining its own Part 70 Operating Permit rather than an Administrative Permit Renewal.

Source Definition

The Aventine ethanol plant (plant number 129-00051), the Consolidated Grain & Barge's (CGB) grain elevator (plant number 129-00014), and the Consolidated Terminals and Logistics (CTL) plant (plant number 129-00054) are all located at the Port of Indiana Maritime Center. In a prior permitting action IDEM, OAQ determined that the Aventine plant and the CGB grain elevator plant were one major source. After construction of the Aventine plant the relationship between those two plants changed from what the sources had planned. CGB has requested a review of the previous source determination. IDEM, OAQ has examined whether these three plants, or any combination of them, should be considered one "major source" as defined at 326 IAC 2-7-1(22). In order for two or more plants to be considered one major source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) the plants must be located on contiguous or adjacent properties.

The CGB grain elevator is owned by Consolidated Grain and Barge Company. The CTL plant is owned by Consolidated Terminals and Logistics Company, which is a wholly owned subsidiary of Consolidated Grain and Barge Company. Therefore the CGB grain elevator and the CTL plant have common ownership, meeting the first element of the major source definition.

The Aventine ethanol plant is owned by Aventine Renewable Energy Holdings, Inc. Aventine Renewable Energy Holdings, Inc. and Consolidated Grain and Barge Company are unrelated

corporations. They do not have common directors on their board of directors and they do not have any corporate officers in common. There is no common ownership between the Aventine plant and the other two plants.

IDEM's Nonrule Policy Document Air-005 applies to the definition of "major source" in 326 IAC 2-7-1(22). IDEM's Nonrule Policy Document Air-005 sets out two independent tests to determine if common control exists when there is no common ownership. The first test, the auxiliary activity test, determines whether one source performs an auxiliary activity which directly serves the purpose of the primary activity and whether the owner or operator of the primary activity has a major role in the day-to-day operations of the auxiliary activity. An auxiliary activity directly serves the purpose of a primary activity by supplying a necessary raw material to the primary activity or performing an integral part of the production process for the primary activity.

Day-to-day control of the auxiliary activity by the primary activity may be evidenced by several factors, including:

- Is a majority of the output of the auxiliary activity provided to the primary activity?
- Can the auxiliary activity contract to provide it products/services to a third-party without the consent of the primary activity?
- Can the primary activity assume control of the auxiliary activity under certain circumstances?
- Is the auxiliary activity required to complete periodic reports to the primary activity?

If one or a combination of these questions is answered affirmatively, common control may exist.

The CGB grain elevator provides a necessary raw material, grain, to the Aventine plant. From June 1, 2011 to May 31, 2012 the CGB grain elevator sold approximately 32% of its total grain output to Aventine. This is less than a majority of the CGB grain elevator's output. It should be noted that other Consolidated Grain and Barge plants, such as Lyle Station (20 miles away) and three CGB plants in Illinois, also provide grain to the Aventine plant. However, under this test, it is only the relationship between this CGB grain elevator and Aventine that is examined.

The CGB grain elevator and Aventine are free to contract with third parties, neither plant can assume control of the other and neither is required to submit periodic reports to the other. The first common control test is therefore not met for the CGB grain elevator and the Aventine plant.

The second common control test in the nonrule policy is the but/for test. This test focuses on whether the auxiliary activity would exist absent the needs of the primary activity. If all or a majority of the output of the auxiliary activity is consumed by the primary activity the but/for test is satisfied. The CGB grain elevator does not supply a majority of its output to the Aventine plant. The CGB grain elevator was in operation prior to Aventine's construction and has many other customers. If the Aventine plant were to shut down the CGB grain elevator would be able to continue to operate. Therefore the second common control test is also not met. IDEM finds that the CGB grain elevator and the Aventine plant are not under common control. Since neither common ownership nor common control exists the first part of the definition of major source is not met for the CGB grain elevator and the Aventine plant.

IDEM now examines whether the CTL plant and the Aventine plant are under common control. Under the first common control test the CTL plant performs an integral part of the production process by shipping Aventine's ethanol and Dry Distillers Grain with Solubles (DDGS) products to market. However, the CTL plant does not provide a majority of its shipping services to Aventine. From June 1, 2011 to May 31, 2012, the CTL plant shipped a total of 279,795 tons of DDGS and ethanol for Aventine, approximately 47% of its total tonnage. CTL's operators expect this percentage to decline in the future, as the CTL plant has applied for a modification to its facility to add material handling for direct reduced iron. Therefore, the CTL plant and the Aventine plant do not meet the first common control test.

Under the second common control test IDEM focuses on whether the CTL plant, as the auxiliary activity, would exist absent the needs of the primary activity, the Aventine plant. The CTL plant

does not supply a majority of its services to the Aventine plant. The CTL plant was in operation prior to Aventine's operation. If the Aventine plant were to shut down the CTL plant would be able to continue to operate. Therefore the second common control test is also not met and the CTL plant and the Aventine plant are not under common control. Since neither common ownership nor common control exists the first part of the definition of major source is not met for the CTL plant and the Aventine plant.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet. The CTL plant belongs to the two-digit Major Group 44, corresponding to SIC Code 4491 for marine cargo handling. The CGB grain elevator belongs to the two-digit Major Group 51, for Wholesale Trade-Nondurable Goods. The Aventine plant belongs to the two-digit Major Group 28, for Chemicals and Allied Products. None of the three plants has the same two-digit SIC Code.

A plant is a support facility to another plant if it dedicates 50% or more of its output to another plant. The CGB grain elevator supplies less than 50% of its output to the Aventine plant. The CTL plant provides less than 50% of its output to the Aventine plant. The CTL plant does not do any shipping for the CGB grain elevator. Since none of the three plants has a support relationship and all three plants have different SIC Codes, none of the three plants meet the second part of the major source definition.

The CGB grain elevator, the CTL plant and the Aventine plant are all on separate properties with no common boundary line. Since they are not on the same or contiguous properties, IDEM examined whether the plants are on adjacent properties.

The term "adjacent" is not defined in Indiana's air permitting rules. IDEM, OAQ has located a May 21, 1988 letter from U.S. EPA Region 8 to the Utah Division of Air Quality and a U.S. EPA Region 5 letter dated October 18, 2010 to Scott Huber at Summit Petroleum Corporation, that discuss the term "adjacent". These letters are in no way binding on IDEM, OAQ, but they are persuasive in that they illustrate a longstanding analysis used to determine if two sources are "adjacent"; going as far back as the preamble to the 1980 NSR program definition of a source. U.S. EPA's consistent approach is that any evaluation of what is "adjacent" must relate to the guiding principal of a common sense notion of "source". The evaluation should look at whether the distance between the plants is sufficiently small that it enables them to operate as a single source. Some sample questions are:

1. Are materials routinely transferred between the plants?
2. Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
3. Is the production process itself split in any way between the plants?

The CGB grain elevator property boundary is about 1,000 feet from the nearest Aventine plant boundary. Grain is frequently transferred from the CGB grain elevator to the Aventine plant. There are no conveyors or other direct connections between the plants. The grain is delivered by truck or railcar using the rail line that runs throughout the Port. Nothing is transferred from Aventine to the CGB grain elevator. The plants have separate managers and separate production staff with no managers or other workers shuttling back and forth to be actively involved in the other plant. The production process itself is not split between the two plants. The Aventine plant receives grain from other grain elevators located much farther away. The CGB grain elevator could be much further away and still function in the same way in relation to the Aventine plant. The CGB grain elevator and the Aventine plant are therefore not adjacent and do not meet the third part of the major source definition.

The CTL plant property is about 1,000 feet from the Aventine plant property. A dedicated pipeline transferring ethanol from the Aventine plant to the CTL plant directly connects the two plants. The

plants have separate managers and separate production staff with no managers or other workers shuttling back and forth to be actively involved in the other plant. Part of any production process is the shipment of products to markets or customers. Although the Aventine plant is capable of shipping out its products by truck or railcar, the CTL plant performs most of the shipment function for the Aventine plant. The relatively short distance between the two plants enables them to operate in this manner, especially with respect to the dedicated pipeline. The CTL plant and the Aventine plant are therefore adjacent, meeting the third part of the major source definition.

The CGB grain elevator property and the CTL plant property are approximately 600 feet apart. No materials are transferred between the two plants. There are no direct connections between the two plants. The plants have separate managers and separate production staff with no managers or other workers shuttling back and forth to be actively involved in the other plant. There are no production processes split between the two plants. The CGB grain elevator and the CTL plant are therefore not adjacent and do not meet the third part of the major source definition.

Since the CGB grain elevator and the Aventine plant do not meet any of the three parts of the major source definition, IDEM, OAQ has determined that the Aventine plant and CGB grain elevator are not part of the same major source. The CTL plant and the Aventine plant do not meet all three parts of the major source definition and, therefore, IDEM, OAQ has determined that the CTL plant and the Aventine plant are not part of the same major source. The CGB grain elevator and the CTL plant do not meet all three parts of the major source definition and IDEM, OAQ has determined that the CGB grain elevator and the CTL plant are not part of the same major source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) North Merchandising House
 - (1) One (1) Grain Storage Ring/Pad, approved in 2002 for construction, identified as P9B, with a capacity of 1 million bushel pile (30,000 tons of grain).
 - (2) One (1) Overhead Totally Enclosed Conveyor, approved in 2002 for construction, identified as P8B, with a maximum capacity of 500 tons per hour.
 - (3) Receiving, approved in 2000 for construction, identified as P7, with a maximum capacity of 336 tons of grain per hour.
 - (4) Conveying, approved in 2000 for construction, identified as P8, with a maximum capacity of 336 tons of grain per hour.
 - (5) Loadout, approved in 2000 for construction, identified as P9, with a maximum capacity of 375 tons of grain per hour.
 - (6) Loadout, approved in 2000 for construction, identified as Hopper Truck P9B, with a maximum capacity of 375 tons of grain per hour.
- (b) One (1) Truck Only Receiving Area, installed in the first quarter of 1978, identified as P1, with a maximum capacity of 1,050 tons of grain per hour, including receiving pits P1A, P1B, with emissions controlled by baghouse C-1 and exhausted to Stack S1, and receiving pit P1C, approved in 2001 for construction, with emissions controlled by baghouse C-3 and exhausted to Stack S3.
- (c) One (1) Truck & Rail Receiving Area, installed in the first quarter of 1978, identified as P2, with a maximum capacity of 420 tons of grain per hour.

- (d) One (1) Grain Storage/Handling Area, installed in 1979, identified as P3, with a maximum capacity of 1,260 tons of grain per hour, with emissions controlled by baghouse C-2 and exhausted to stack S-2.
- (e) One (1) natural gas-fired grain dryer, known as P4, exhausted to S-4, approved in 2012 for construction, rated at 46.0 million British thermal units per hour (mmBtu/hr), capacity: 141.0 tons of grain per hour.
- (f) One (1) natural gas-fired column grain dryer, approved in 2003 for construction, identified as P4A, rated at 21.6 million British thermal units per hour, exhausting to Stack S-5, with a maximum capacity of 105 tons of grain per hour.
- (g) One (1) Barge Loadout Area, installed in the first quarter of 1978, identified as P5, with emissions controlled by a telescoping spout, with a maximum capacity of 500 tons of grain per hour.
- (h) One (1), Truck Loadout Area, installed in the first quarter of 1978, identified as P6A, with emissions controlled by a spout extension, with a maximum capacity of 336 tons of grain per hour.
- (i) One (1) enclosed reclaim conveyor leg, for rail or truck loadout, approved in 2003 for construction, identified as P6B, equipped with a bulk weigh station at its discharge, with a maximum capacity of 850 tons of grain per hour.
- (j) One (1) enclosed conveyor leg, approved in 2005 for construction, identified as P1D, with a maximum capacity of 700 tons of grain per hour, controlled by baghouse C-1.
- (k) One (1) enclosed grain storage conveyor, approved in 2009 for construction, identified as P10A, with a maximum capacity of 336 tons of grain per hour.

Consolidated Grain and Barge, Co. is replacing the following permitted emission unit:

- (e) One (1) natural gas-fired grain dryer, installed in 1994, identified as P4, rated at 36.0 million British thermal units per hour (mmBtu/hr), exhausting to S-4, with a maximum capacity of 84.0 tons of grain per hour.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit
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IDEM is not aware of any emission units that were constructed and/or are operating without a permit.

Emission Units and Pollution Control Equipment Removed From the Source

IDEM is not aware of any emission units that were removed from the source.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) One (1) Grain Storage Bin, approved in 2009 for construction, identified as P10, with a maximum capacity of 18,228 tons of grain. [326 IAC 6-3-2]
- (b) Paved roads and parking lots with public access. [326 IAC 6-4]

Existing Approvals

Since the issuance of the Part 70 Administrative Operating Permit (T129-24928-00014) on September 20, 2007, the source has constructed or has been operating under Administrative Amendment No. (129-27711-00014) issued on May 22, 2009.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Posey County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

- (a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Posey County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM_{2.5}
Posey County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) **Other Criteria Pollutants**
Posey County has been classified as attainment or unclassifiable in Indiana for CO, NO₂, PM₁₀, SO₂, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Tons/year
CO	24.38
NO _x	29.03
PM	3,552
PM ₁₀	1,381
PM _{2.5}	236.55
SO ₂	0.17
VOC	1.60
GHGs as CO ₂ e	35,046
HAP Hexane	0.52
Total HAP	0.55

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM₁₀, and PM_{2.5}, is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Actual Emissions

The following table shows the actual emissions as reported by the source. This information reflects the 2009 OAQ emission data.

Pollutant	Actual Emissions (ton/year)
CO	2.74
NO _x	3.27
PM	26.21
PM ₁₀	7.06
PM _{2.5}	1.38
SO ₂	0.02
VOC	0.18
CO ₂	3,918
CH ₄	0.08
N ₂ O	0.07
HAP Hexane	0.06

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Description of Proposed Modification

- (a) The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Consolidated Grain & Barge Co. on May 1, 2012, relating to replacement of the P4 grain dryer. The following is a list of the proposed emission unit:

One (1) natural gas-fired grain dryer, known as P4, exhausted to S-4, approved in 2012 for construction, rated at 46.0 million British thermal units per hour (mmBtu/hr), capacity: 141.0 tons of grain per hour.
- (b) Stack Summary

The new grain dryer will utilize the existing stack, S-4
- (c) Emission Calculations

The emission calculations associated with this modification are included in the source-wide emission calculations. See Appendix A of this Technical Support Document for the detailed emission calculations.
- (d) Permit Level Determination - Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and

operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
CO	16.59
NO _x	19.75
PM	136.24
PM ₁₀	35.47
PM _{2.5}	7.31
SO ₂	0.12
VOC	1.09
GHGs as CO ₂ e	24,848
HAP Hexane	0.36
Total HAPs	0.37

This source modification is subject to 326 IAC 2-7-10.5(f)(4) because the potential to emit PM and PM₁₀ are greater than twenty-five (25) tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	CO	NO_x	PM	PM₁₀*	PM_{2.5}**	SO₂	VOC	CO₂e**	Total HAPs	Single HAP
Truck Receiving and Receiving Pit (P1A & P1B)	--	--	5.63	36.88	45.99	--	--	--	--	--
Truck Receiving and Receiving Pit (P1C)	--	--	5.63	36.88	45.99	--	--	--	--	--
Conveyor Leg (P1D)	--	--	3.20	35.70	17.78	--	--	--	--	--
Rail/HB and Hopper Truck Receiving (P2)	--	--	27.58	6.15	2.39	--	--	--	--	--
Grain Handling (P3)	--	--	3.20	35.70	32.01	--	--	--	--	--
Grain Dryer (P4)	--	--	24.75	6.19	5.81	--	--	--	--	--
Grain Dryer (P4A)	--	--	44.00	11.00	4.32	--	--	--	--	--
Grain Barge Loadout (P5)	--	--	12.80	3.20	1.20	--	--	--	--	--
Grain Truck Loadout (P6A)	--	--	33.54	18.85	7.21	--	--	--	--	--
Enclosed Reclaim Conveyor Leg (P6B)	--	--	10.98	10.20	21.59	--	--	--	--	--
North Merchandising House Receiving (P7)	--	--	4.90	1.09	1.91	--	--	--	--	--

Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	CO	NO _x	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	VOC	CO ₂ e** *	Total HAPs	Single HAP
North Merchandising House Conveying (P8)	--	--	8.54	4.76	8.54	--	--	--	--	--
North Merchandising House Enclosed Conveying (P8B)	--	--	8.54	4.76	12.70	--	--	--	--	--
North Merchandising House Loadout (P9)	--	--	12.04	4.06	8.05	--	--	--	--	--
North Merchandising House Loadout (Hopper Truck - P9B)	--	--	12.04	4.06	9.89	--	--	--	--	--
Grain Storage Bin (P10)	--	--	1.37	0.34	0.06	--	--	--	--	--
Grain Storage Bin Conveyor (P10A)	--	--	7.32	6.80	8.54	--	--	--	--	--
Grain Storage Ring/Pad (P9B)	--	--	1.01	0.35	0.35	--	--	--	--	--
Grain Dryer (P4) - NG combustion	16.59	19.75	0.38	1.50	1.50	0.12	1.09	23,848	0.37	0.36 (hexane)
Grain Dryer (P4A) - NG combustion	7.79	9.28	0.18	0.70	0.70	0.06	0.51	11,198	0.18	0.17 (hexane)
Total PTE of Entire Source	24.38	29.03	227.61	229.17	236.55	0.17	1.60	35,046	0.55	0.52 (hexane)
Title V Major Source Thresholds	100	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA

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

**PM_{2.5} listed is direct PM_{2.5}.

*** Green House Gas (GHG) values are given on a basis of CO₂ equivalent emissions.

This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO₂ equivalent emissions (CO₂e) per year, and it is not in one of the twenty-eight (28) listed source categories.

In order to keep the entire source minor for PSD for PM and PM₁₀, **this source has elected to limit the potential to emit of this modification as follows:**

The annual grain throughput to the grain merchandising emission units, including the particulate emissions shall not exceed the limits in the table below:

Process/Emission Units	Throughput Limits (ton/yr)	PM Emissions Limit (lb/ton)	PM ₁₀ Emissions Limit (lb/ton)
Grain Drying process (Dryer P4)	225,000	0.22	0.055

The throughput limit shall be based on a twelve (12) month period, with compliance determined at the end of each month.

Compliance with these limits and the limits established for the existing units at the source shall limit the PM and PM₁₀ emissions from the source to less than 250 tons per twelve (12) months, each. Compliance with these conditions shall render the requirements of 326 IAC 2-2, PSD not applicable.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant		Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)	
Truck Only Receiving Area P-1 (P1A & P1B)	PM	BH C-1	Y	827.82	2.81	100	Y	N	
	PM ₁₀		Y	271.34	0.92	100	Y	N	
	PM _{2.5}		N	45.99	0.16	100	N	N	
Conveyor Leg (P1D)	PM		Y	187.03	3.05	100	Y	N	
	PM ₁₀		Y	104.24	1.70	100	Y	N	
	PM _{2.5}		N	17.78	0.29	100	N	N	
Grain Storage/ Handling Areas (P3)	PM		BH C-2	Y	336.65	3.13	100	Y	N
	PM ₁₀			Y	187.64	1.74	100	Y	N
	PM _{2.5}			N	32.01	0.30	100	N	N
Receiving Pit (P1C)	PM	BH C-3	Y	827.82	2.81	100	Y	N	
	PM ₁₀		Y	271.34	0.92	100	Y	N	
	PM _{2.5}		N	45.99	0.16	100	N	N	

The above listed emission units are the only processed that are using add-on control devices to reduce particulate emissions. The grain truck loadout operation uses a spout extension design to minimize particulate emissions. The reclaim conveyor and grain storage bin conveyor both use enclosure to minimize particulate emissions. Pursuant to 40 CFR 64.1, "... a control device does not include passive control measures that act to prevent pollutants from forming, such as the use of seals, lids, or roofs to prevent the release of pollutants, use of low-polluting fuel or feedstocks, or the use of combustion or other process design features or characteristics." Based on this clarification under the definition of control device, these operations are not using a control device. Therefore, CAM is not applicable to these operations.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the Truck Only Receiving Area P-1 (P1A & P1B), the Conveyor Leg (P1D), the Grain Storage/Handling Areas (P3), and the Receiving Pit (P1C), for PM and PM₁₀. A CAM plan has been submitted and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

New Source Performance Standards (NSPS)

There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

The Standards of Performance for Grain Elevators (326 IAC 12, 40 CFR 60, Subpart DD) are not applicable to the grain elevator at Consolidated Grain and Barge because the storage capacity is less than 2.5 million bushels per year. This determination does not change in this Part 70 Permit Renewal, since the source is not being physically modified to increase its permanent storage capacity.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

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

The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is an area source under 40 CFR 63.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

326 IAC 1-5-2 (Emergency Reduction Plans)

The source is subject to 326 IAC 1-5-2.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

Consolidated Grain & Barge Co. has elected to take federally enforceable limits to remain a minor source under PSD. The following emission limitations for Consolidated Grain and Barge, Co. are needed to keep the source minor under PSD for PM and PM₁₀:

The annual grain throughput to the grain merchandising emission units, including the particulate emissions shall not exceed the limits in the table below:

Process/Emission Units	Throughput Limits (ton/yr)	PM Emissions Limit (lb/ton)	PM ₁₀ Emissions Limit (lb/ton)	Control ID
Truck Receiving and Receiving Pit (P1A & P1B)	1,250,000	0.18	0.059	Baghouse C-1
Truck Receiving and Receiving Pit (P1C)	1,250,000	0.18	0.059	Baghouse C-3
Conveyor Leg (P1D)	2,100,000	0.061	0.034	Baghouse C-1
Rail/HB and Hopper Truck Receiving (P2)	1,576,000	0.035	0.0078	n/a
Grain Handling (P3)	2,100,000	0.061	0.034	Baghouse C-2
Grain Drying process (Dryer P4)	225,000	0.22	0.055	n/a
Grain Drying process (Dryer P4A)	400,000	0.22	0.055	n/a
Grain Barge Loadout (P5)	1,600,000	0.016	0.0040	Telescoping Spout
Grain Truck Loadout (P6A)	1,300,000	0.086	0.029	Spout Extension
Enclosed Reclaim Conveyor Leg (P6B)	600,000	0.061	0.034	n/a
North Merchandising House Receiving (P7)	280,000	0.035	0.0078	n/a
North Merchandising House Conveying (P8)	280,000	0.061	0.034	n/a
North Merchandising House Enclosed Conveying (P8B)	280,000	0.061	0.034	n/a
North Merchandising House Loadout (P9)	280,000	0.086	0.029	n/a

Process/Emission Units	Throughput Limits (ton/yr)	PM Emissions Limit (lb/ton)	PM ₁₀ Emissions Limit (lb/ton)	Control ID
North Merchandising House Loadout (Hopper Truck - P9B)	280,000	0.086	0.029	n/a
Grain Storage Bin Conveyor (P10A)	400,000	0.061	0.034	n/a

Each throughput limit shall be based on a twelve (12) month period, with compliance determined at the end of each month.

Compliance with these limits shall limit the PM and PM₁₀ emissions from the source to less than 250 tons per twelve (12) months, each. Compliance with these conditions shall render the requirements of 326 IAC 2-2, PSD not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of PM, PM₁₀, and PM_{2.5}, is greater than 250 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(1), annual reporting is required. An emission statement shall be submitted by July 1, 2012, and every year thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

State Rule Applicability – Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

PSD applicability is discussed under the State Rule Applicability – Entire Source.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

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

Process/Emission Units	Process Weight Rate (ton/hr)	PM Emissions Limit (lb/hr)
Truck Receiving and Receiving Pit (P1A & P1B)	1,050	78.2
Truck Receiving and Receiving Pit (P1C)	1,050	78.2
Conveyor Leg (P1D)	700	73.0
Rail/HB and Hopper Truck Receiving (P2)	420	67.0
Grain Storage/ Handling (P3)	1,260	80.6
Grain Drying process (Dryer P4)	141	54.79
Grain Drying process (Dryer P4A)	105	51.8
Grain Barge Loadout (P5)	500	69.0
Grain Truck Loadout (P6A)	336	64.3
Enclosed Reclaim Conveyor Leg (P6B)	850	75.5
North Merchandising House Receiving (P7)	336	64.3
North Merchandising House Conveying (P8)	336	64.3
North Merchandising House Enclosed Conveying (P8B)	500	69.0
North Merchandising House Loadout (P9)	375	65.6
North Merchandising House Loadout (Hopper Truck - P9B)	461	68.0

Process/Emission Units	Process Weight Rate (ton/hr)	PM Emissions Limit (lb/hr)
Grain Storage Bin (P10)	12.5	22.3
Grain Storage Bin Conveyor (P10A)	336	64.3

- (a) Interpolation and extrapolation of the data for the process weight rate less than sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:
- $$E = 4.1 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}$$
- (b) Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:
- $$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}$$
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), when the process weight rate exceeds two hundred (200) tons per hour, the allowable emissions may exceed that shown in the table in 326 IAC 6-3-2(e) provided the concentration of particulate in the discharge gases to the atmosphere is less than one tenth (0.10) pound per one thousand (1,000) pounds of gases.

The particulate control equipment shall be in operation at all times the corresponding facilities are in operation, in order to comply with this limit.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

Compliance Determination Requirements

The compliance determination requirements applicable to this source are as follows:

Emission Unit	Control Device	Pollutant	Frequency of Testing	Applicable Requirement
Truck Only Receiving Area P-1 (P1A & P1B)	Baghouse C-1	PM < 0.18 lb/ton; PM ₁₀ < 0.059 lb/ton	every 5 years	326 IAC 2-2
		PM < <78.2 lb/hr	every 5 years	326 IAC 6-3-2
Conveyor Leg (P1D)		PM < 0.061 lb/ton; PM ₁₀ < 0.034 lb/ton	every 5 years	326 IAC 2-2
		PM < <73.0 lb/hr	every 5 years	326 IAC 6-3-2
Grain Storage/Handling Areas (P3)	Baghouse C-2	PM < 0.061 lb/ton; PM ₁₀ < 0.034 lb/ton	every 5 years	326 IAC 2-2
		PM < 80.6 lb/hr	every 5 years	326 IAC 6-3-2
Receiving Pit (P1C)	Baghouse C-3	PM < 0.18 lb/ton; PM ₁₀ < 0.059 lb/ton	every 5 years	326 IAC 2-2
		PM < 78.2 lb/hr	every 5 years	326 IAC 6-3-2

These testing requirements are necessary to verify that the Truck Only Receiving Area P-1 (P1A & P1B) and Conveyor Leg (P1D), Grain Storage/Handling Areas (P3), and Receiving Pit (P1C), are in compliance with the limits established by 326 IAC 2-2 (PSD) and 326 IAC 6-3-2 (Process Operations).

Compliance Monitoring Requirements

The compliance monitoring requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse C-1 [Truck Only Receiving Area P-1 (P1A & P1B) and Conveyor Leg (P1D)]	Pressure Drop	Daily	1.0 to 6.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Baghouse C-2 [Grain Storage/Handling Areas (P3)]	Pressure Drop	Daily	1.0 to 6.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Baghouse C-3 [Receiving Pit (P1C)]	Pressure Drop	Daily	1.0 to 6.0 inches	Response Steps
	Visible emissions		Normal-Abnormal	

Broken or Failed Bag Detection:

In the event that bag failure has been observed:

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions), or

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

These monitoring conditions are necessary because the baghouses for the Truck Only Receiving Area P-1 (P1A & P1B) and Conveyor Leg (P1D), Grain Storage/Handling Areas (P3), and Receiving Pit (P1C), must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-7 (Part 70), 326 IAC 6-3-2 (Process Operations), and 40 CFR 64 (CAM).

Proposed Changes

The changes listed below have been made to Part 70 Administrative Operating Permit Renewal No. T 129-31275-00014. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

Change No. 1 IDEM, OAQ has made the following changes to Condition A.1, General Information:

- The word "stationary" has been added to further clarify the type of operation.
- IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
- The Status with regard to greenhouse gases has been added.
- The status has been updated to specify that this source does not qualify as one of the 28 listed source categories.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a **stationary** grain merchandising plant.

Source Address:	2801 Bluff Road, Mt. Vernon, Indiana 47620
Mailing Address:	P.O. Box 547, Mt. Vernon, IN 47620
General Source Phone Number:	(812) 218-5240
SIC Code:	5153
County Location:	Posey
Source Location Status:	Attainment for all criteria pollutants

Source Status:

Part 70 Operating Permit Program
Minor Source, under PSD Rules
Greenhouse Gas (GHG) potential to emit (PTE) is less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year
Major Area Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

Change No. 2 The emission unit descriptions in Section A and the corresponding descriptions in Section D of the permit, have been updated as follows:

- On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions.
- The word "stationary" has been added to further clarify the type of operation.
- The descriptions of the emission units were clarified.
- The existing P4 grain dryer is removed and replaced with a new P4 grain dryer that has a larger capacity and larger heat input rate.
- The P10A grain storage conveyor has been added to the list of equipment. This unit was permitted in 2009; however, the description was not included in the final permit.
- Paved roads and parking lots were added to the list of insignificant activities, as this process is regulated under 326 IAC 6-4.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]-14]

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

- (a) One (1) North Merchandising House--
- (1) One (1) Grain Storage Ring/Pad, ~~known~~ **approved in 2002 for construction, identified** as P9B, with a capacity of 1 million bushel pile. ~~This storage ring/pad will enable the source to better handle the large amount of grain that is received during fall harvest, which is a twice per year fill.~~ **(30,000 tons of grain).**
 - (2) One (1) Overhead Totally Enclosed Conveyor, ~~known~~ **approved in 2002 for construction, identified** as P8B, with a maximum ~~rate~~ **capacity** of 500 tons per hour.
 - (3) Receiving, ~~known~~ **approved in 2000 for construction, identified** as P7, with a **maximum** capacity ~~of~~ **of** 336 tons of grain per hour.
 - (4) Conveying, ~~known~~ **approved in 2000 for construction, identified** as P8, with a **maximum** capacity ~~of~~ **of** 336 tons of grain per hour.
 - (5) Loadout, ~~known~~ **approved in 2000 for construction, identified** as P9, with a **maximum** capacity ~~of~~ **of** 375 tons of grain per hour.
 - (6) **Loadout, approved in 2000 for construction, identified as Hopper Truck P9B, with a maximum capacity of 375 tons of grain per hour.**

- (b) One (1) Truck Only Receiving Area, ~~known as P1, installed in the first quarter of 1978,~~ **installed in the first quarter of 1978, identified as P1, installed in the first quarter of 1978,** with a maximum design throughput capacity of 1,050 tons of grain per hour and 784,000 tons of grain per year, including receiving pits P1A, P1B, with emissions controlled by baghouse C-1 and exhausted to Stack S1, and receiving pit P1C, **approved in 2001 for construction,** with emissions controlled by baghouse C-3 and exhausted to Stack S3. ~~This operation (P1) is permitted in 2007 to increase yearly throughput rate to 2,000,000 tons.~~
- (c) One (1) Truck & Rail Receiving Area, ~~known as P2,~~ **installed in the first quarter of 1978, identified as P2,** with a maximum capacity: of 420 tons of grain per hour.
- (d) One (1) Grain Storage/Handling Area, ~~known as P3, exhausted to stack S-2, installed in 1979, controlled by baghouse C-2,~~ **identified as P3, with a maximum capacity: of 1,260 tons of grain per hour and 784,000 tons of grain per year. This operation (P3) is permitted in 2007 to increase yearly throughput rate to 3,000,000 tons, with emissions controlled by baghouse C-2 and exhausted to stack S-2.**
- (e) One (1) natural gas-fired grain dryer, ~~known as P4, exhausted to S-4, installed in 1994,~~ **approved in 2012 for construction, identified as P4, exhausted to S-4, installed in 1994,** rated at 3646.0 million British thermal units per hour (mmBtu/hr), **exhausting to S-4, with a maximum capacity: 84 of 141.0 tons of grain per hour.**
- (f) One (1) natural gas-fired column grain dryer, **approved in 2003 for construction,** identified as P4A, rated at 21.6 million British thermal units per hour, exhausting to Stack S-5, **with a maximum capacity: of 105 tons of grain per hour.**
- (g) One (1) Barge Loadout Area, ~~known as P5, installed in the first quarter of 1978,~~ **installed in the first quarter of 1978, identified as P5, installed in the first quarter of 1978,** with emissions controlled by a telescoping spout, **with a maximum capacity: of 500 tons of grain per hour.**
- (h) One (1), Truck Loadout Area, ~~known as P6A, installed in the first quarter of 1978,~~ **installed in the first quarter of 1978, identified as P6A, installed in the first quarter of 1978,** with emissions controlled by a spout extension, **with a maximum capacity: of 336 tons of grain per hour.**
- (i) One (1) enclosed reclaim conveyor leg, for rail or truck loadout, **approved in 2003 for construction,** identified as P6B, equipped with a bulk weigh station at its discharge, **with a maximum capacity: of 850 tons of grain per hour.**
- (j) One (1) enclosed conveyor leg, **approved in 2005 for construction,** identified as P1D, capacity: 450 tons of grain per hour and 784,000 tons of grain per year, controlled by baghouse C-1. ~~This operation (P1D) is permitted in 2007 to increase throughput to with a maximum capacity of 700 tons of grain per hour and 2,000,000 tons of grain per year, controlled by baghouse C-1.~~
- (k) **One (1) enclosed grain storage conveyor, approved in 2009 for construction, identified as P10A, with a maximum capacity of 336 tons of grain per hour.**

A.3 **Specifically Regulated** Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]-14]

This **stationary** source ~~also includes~~ **consists of** the following insignificant activities, as defined in 326 IAC 2-7-1(21): **that have applicable requirements:**

- (a) One (1) Grain Storage Bin ~~with an associated conveyor,~~ **approved in 2009 for construction,** identified as P10, with a maximum capacity of 18,228 tons of grain, ~~approved in 2009 for construction.~~ **[326 IAC 6-3-2]**

(b) Paved roads and parking lots with public access. [326 IAC 6-4]

Change No. 3 The word "stationary" has been added to further clarify the type of operation:

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This **stationary** source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

Change No. 4 Sections B and C of the permit have been updated to be the current standard language for Part 70 Permits.

- Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses and contact information listed in the permit. References to "Permit Administration and Development Section" and the "Permits Branch" have been changed to "Permit Administration and Support Section". References to "Asbestos Section", "Compliance Data Section", "Air Compliance Section", "Compliance Section", and "Compliance Branch" have been changed to "Compliance and Enforcement Branch".
- IDEM, OAQ has decided to clarify what rule requirements a certification needs to meet throughout the permit:
- 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."
- IDEM, OAQ 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 timeline have been switched to "no later than" or "not later than", unless the rule specifically states "within".
- There may be times when it is unnecessary for a responsible official to "certify" additional information requested by IDEM; therefore, paragraph (a) of "Duty to Provide Information", is revised.
- IDEM, OAQ has decided to clarify that Section B - Certification only states what a certification must be in Condition B.8, Certification, to be consistent with the rule.
- On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions.
- IDEM, OAQ has clarified the rule site for Preventive Maintenance Plan, and the IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. Where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of "Preventive Maintenance Plan", and has amended paragraph (e) of "Emergency Provisions".

- IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM, OAQ has removed Condition B.15, Deviations from Permit Requirements and Conditions. These requirements have been moved to the General Reporting Requirements in Section C of the permit. The remaining conditions in this section have been renumbered.
- Section B - Permit Renewal: IDEM, OAQ has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information.
- IDEM, OAQ has decided to state that no notice is required for approved changes in Section B - Permit Revision Under Economic Incentives and Other Programs.
- The Source Modification Requirements have been updated.
- IDEM, OAQ has added 326 IAC 5-1-1 to the exception clause of Condition C.1, Opacity, since 326 IAC 5-1-1 does list exceptions.
- IDEM, OAQ has revised "Incineration" to more closely reflect the two underlying rules.
- The notice for Asbestos Abatement Projects 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.
- IDEM, OAQ has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
- Section C - Compliance Monitoring: The reference to record keeping has been removed due to the fact that other conditions already address record keeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition. IDEM, OAQ has decided to clarify the Permittee's responsibility under CAM.
- IDEM, OAQ has removed "Monitoring Methods". The conditions that require the monitoring or testing, if required, state what methods shall be used.
- IDEM has decided not to list the submission date of the ERP because the ERP can be updated without permit change.
- 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 record keeping 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. IDEM, OAQ has decided to clarify the Permittee's responsibility under CAM.

- 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.
- Paragraph (b) of Section C - Emission Statement has been removed. It was duplicative of the requirement in Section C - General Reporting Requirements.
- Section C - General Record Keeping: IDEM clarified what is meant by "support information" and what is expected for "monitoring information".
- Section C - General Reporting: IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM, OAQ removed "Deviations from Permit Requirements and Conditions" (also noted above). These requirements have been moved to paragraph (a) of the General Reporting Requirements. IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions. IDEM, OAQ has decided to clarify the Permittee's responsibility under CAM.
- IDEM, OAQ has decided to simplify the referencing in "Compliance with 40 CFR 82 and 326 IAC 22-1"

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, ~~TV 129-24928~~**T129-31275**-00014, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. ~~The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-4(34).~~ Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) ~~Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance~~ **A certification submitted shall contain required by this permit meets the requirements of 326 IAC 2-7-6(1) if:**
- (1) ~~it contains a certification by the~~ **it contains a certification by the** "responsible official" ~~of truth, accuracy, as defined by 326 IAC 2-7-1(34), and completeness. This~~
 - (2) ~~the certification shall state~~ **the 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 Permittee may use** the attached Certification Form, **or its equivalent** with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. ~~The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent~~ **All** certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
and
- United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) ~~(e)~~—The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;

- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require ~~thea~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~thea~~ "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (1312)] [326 IAC 2-71-6(1) and (6)]
~~[326 IAC 1-6-3]-3]~~

~~(a)~~ **(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) ~~withi~~**no later than** ninety (90) days after issuance of this permit **or ninety (90) days after initial start-up, whichever is later**, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require ~~thea~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~thea~~ "responsible official" as defined by 326 IAC 2-7-1(34).

~~(b)~~ **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 ~~or potential to emit~~. The PMPs **and their submittal** do not require ~~thea~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~thea~~ "responsible official" as defined by 326 IAC 2-7-1(34).
- (e-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.11 Emergency Provisions [326 IAC 2-7-16]

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, **Compliance and Enforcement Branch**), or

~~Compliance Section~~, or

Telephone Number: 317-233-0178 (ask for **Office of Air Quality**, Compliance ~~Section~~ **and Enforcement Branch**)

Facsimile Number: 317-233-6865

Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require ~~thea~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~thea~~ "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(98) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- ~~(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.~~

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to ~~TV-129-24928~~**T129-31275-00014** and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3)** deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

~~B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]~~

- ~~(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported 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 46204-2254~~

~~using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.~~

~~The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.~~

~~B.16B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]~~

- ~~(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require ~~the~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:~~
- ~~(1) That this permit contains a material mistake.~~
 - ~~(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.~~
 - ~~(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]~~
- ~~(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]~~
- ~~(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]~~

B.4716 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require ~~thea~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~thea~~ "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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 2-7-4(a)(2)(D)**, in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.4817 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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~~ **does require a certification that meets the requirements of 326 IAC 2-7-6(1)** by ~~thea~~ "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.1918 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision **or notice** shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.2019 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), ~~(c),~~ or **(ec)** without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), ~~(c),~~ or **(ec)**. The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), ~~(c)(1),~~ and **(e)(2c)(1)**.

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require ~~the~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ "a responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.2420 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2-~~and~~ 326 IAC 2-7-10.5.

B.2322 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any ~~such~~ application which shall be submitted by the Permittee does require ~~the~~ certification ~~by the~~ **that meets the requirements of 326 IAC 2-7-6(1)** by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.2 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 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~~ **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.5 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). **326 IAC 6-4-2(4) is not federally enforceable.**

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

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the **attached** plan ~~submitted on. The plan is included as in Attachment A.~~ **The provisions of 326 IAC 6-5 are not federally enforceable.**

C.7 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 the~~ **that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official"** as defined by 326 IAC 2-7-1(34).

- (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.

C.8 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(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:**

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification **that meets the requirements of 326 IAC 2-7-6(1)** by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification **that meets the requirements of 326 IAC 2-7-6(1)** by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] [40 CFR 64] [326 IAC 3-8]

- (a) Unless otherwise specified in this permit, **for all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required** **allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring related to that equipment.** If due to circumstances beyond ~~its~~ **the Permittee's control, that any monitoring equipment required by this permit** cannot be installed and operated ~~within~~ **no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later,** the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require ~~the~~ a certification **that meets the requirements of 326 IAC 2-7-6(1)** by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (b) **For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.**
- (c) **For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or**

fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

~~C.11 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.11C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]~~

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

~~C.1312 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]~~

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

- ~~(a) The Permittee shall **prepare-maintain the most recently submitted** written emergency reduction plans (ERPs) consistent with safe operating procedures.~~
- ~~(b) These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~within ninety (90) days after the date of issuance of this permit.~~

~~The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~
- ~~(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~
- ~~(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~
- ~~(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

C.4413 Risk Management Plan [326 IAC 2-7-5(4211)] [40 CFR 68]

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

C.4514 Response to Excursions or Exceedances [40 CFR 64] [326 IAC 3-8] [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion **where a response step is required by the D Section or an exceedance, the 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 ~~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. **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 ~~within the indicator range, designated condition,~~ **normal** or below the applicable emission limitation or standard, ~~as applicable.~~ **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 ~~maintain the following records:~~ **record the reasonable response steps taken.**
 - ~~(1) monitoring data;~~
 - ~~(2) monitor performance data, if applicable; and~~
 - ~~(3) corrective actions taken.~~

(II)

(a) CAM Response to excursions or exceedances.

(1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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. 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). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or 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.

(2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

**(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).**

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

- (f) **Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:**
- (1) **Failed to address the cause of the control device performance problems; or**
 - (2) **Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (g) **Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or record keeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.**
- (h) ***CAM record keeping requirements.***
- (1) **The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.**
 - (2) **Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable record keeping requirements.**

C.4615 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 its~~ response actions to IDEM, OAQ, ~~within thirty (30)~~ **no later than seventy-five (75) days of receipt after the date** 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~~ **no later than** one hundred ~~twenty (120)~~ **eighty (180) days of receipt of** ~~the original~~ **date of the** test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred ~~twenty (120)~~ **eighty (180) days** is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require ~~the~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ "responsible official" as defined by 326 IAC 2-7-1(34).

C.4716 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

~~(a)~~ Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require ~~the~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ "a "responsible official"" as defined by 326 IAC 2-7-1(34).

~~(b)~~ ~~The emission statement 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.4817 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(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. **Support information includes the following:**

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.

(EE) The results of such analyses.

(FF) The operating conditions as existing at the time of sampling or measurement.

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 implemented within 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.4918 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph.** Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. **except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** This report shall be submitted ~~within~~ **not later than** thirty (30) days ~~after~~ the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34). **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.**
- (b) The ~~address for report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to~~ **submittal is:**
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- ~~(c)~~ Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- ~~(d)~~ ~~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 the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(e)~~ ~~The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.~~ **(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.

C.2019 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) ~~Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.~~
- (b) ~~Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~
- (c) ~~Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.~~

Change No. 5 Since all of the permit conditions are operating conditions, the title "Operation Conditions" has been removed from Section D.1.

Operation Conditions

Change No. 6 The PSD minor limits for particulate have been updated as follows to update PM and PM₁₀ limits, to remove the old P4 grain dryer, and to add the new P4 grain dryer:

D.1.1 Prevention of Significant Deterioration (PSD) Minor PM and PM₁₀ Emission Limits [326 IAC 2-2]

(a) The annual grain throughput to the grain merchandising emission units, including the particulate emissions shall not exceed the limits in the table below:

Process/Emission Units	Throughput Limits (ton/yr)	Throughput Limits (ton/yr)	PM Emissions Limit (lb/ton)	PM₁₀ Emissions Limit (lb/ton)	Control ID
Truck Receiving and Receiving Pit (P1A & P1B)	625,000	1,250,000	0.18	0.059	Baghouse C-1
Truck Receiving and Receiving Pit (P1C)	625,000	1,250,000	0.18	0.059	Baghouse C-3
Conveyor Leg (P1D)	2,000,000	2,100,000	0.061	0.034	Baghouse C-1
Rail/HB and Hopper Truck Receiving (P2)	784,000	1,576,000	0.035	0.0078	n/a
Grain Handling (P3)	2,050,000	2,100,000	0.061	0.034	Baghouse C-2
Grain Drying process (Dryer P4)	160,000		0.22	0.055	n/a
Grain Drying process (Dryer P4)		225,000	0.22	0.055	n/a
Grain Drying process (Dryer P4A)	200,000	400,000	0.22	0.055	n/a
Grain Barge Loadout (P5)	800,000	1,600,000	0.016	0.0040	Telescoping Spout
Grain Truck Loadout (P6A)	650,000	1,300,000	0.086	0.029	Spout Extension
Enclosed Reclaim Conveyor Leg (P6B)	300,000	600,000	0.061	0.034	n/a

North Merchandising House Receiving (P7)	440,000	280,000	0.035	0.0078	n/a
North Merchandising House Conveying (P8)	440,000	280,000	0.061	0.034	n/a
North Merchandising House Enclosed Conveying (P8B)	440,000	280,000	0.061	0.034	n/a
North Merchandising House Loadout (P9)	440,000	280,000	0.086	0.029	n/a
North Merchandising House Loadout (Hopper Truck - P9B)	440,000	280,000	0.086	0.029	n/a
Grain Storage Bin (P10)	100,000		0.0025	0.0063	
Grain Storage Bin Conveyor (P10A)	400,000	400,000	0.061	0.034	n/a

Each throughput limit shall be based on a twelve (12) month period, with compliance determined at the end of each month. Compliance with these particulate emission limits shall limit the particulate **PM and PM₁₀** emissions from the source to less than 250 tons per **twelve (12) months, each year**, which renders the requirements of 326 IAC 2-2, Prevention of Significant Deterioration (PSD) not applicable.

Change No. 7 The PSD minor limits for NO_x, CO, and SO₂, have been removed as follows, as they are no longer needed:

~~D.1.2 Prevention of Significant Deterioration (PSD) Minor NO_x, CO and SO₂ Emission Limits [326 IAC 2-2]~~

- ~~(a) The NO_x emissions from the two (2) grain dryers (P4 and P4A) shall not exceed 100 pounds per million cubic feet of natural gas.~~
- ~~(b) The CO emissions from the two (2) grain dryers (P4 and P4A) shall not exceed 84 pounds per million cubic feet of natural gas.~~
- ~~(c) The total input of natural gas fuel to the two (2) grain dryers (P4 and P4A) shall not exceed 504 million cubic feet per twelve (12) consecutive month period, with compliance at the end of each month.~~

~~Compliance with these limits in conjunction with the NO_x, CO and SO₂ emission limits in the Aventine's NSR/Part 70 129-24836-00051, shall limit the NO_x, CO and SO₂ emissions from the entire source (Aventine's ethanol production plant, including the nested package boilers and Consolidated Grain & Barge Co. grain merchandising plant) to less than 250 tons per year. Compliance with this condition shall render the requirements of 326 IAC 2-2, PSD not applicable.~~

Change No. 8 The Particulate Emission Limitations have been updated as follows to remove the old P4 grain dryer, and to add the new P4 grain dryer:

~~D.1.3 D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]~~

- ~~(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of the following processes shall not exceed the pound per hour limits as follows:~~

Process/Emission Units	Process Weight Rate (ton/hr)	PM Emissions Limit (lb/hr)
Truck Receiving and Receiving Pit	1,050	78.2

Process/Emission Units	Process Weight Rate (ton/hr)	PM Emissions Limit (lb/hr)
(P1A & P1B)		
Truck Receiving and Receiving Pit (P1C)	1,050	78.2
Conveyor Leg (P1D)	700	73.0
Rail/HB and Hopper Truck Receiving (P2)	420	67.0
Grain Storage/ Handling (P3)	1,260	80.6
Grain Drying process (Dryer P4)	84	49.54
Grain Drying process (Dryer P4)	141	54.79
Grain Drying process (Dryer P4A)	105	51.8
Grain Barge Loadout (P5)	500	69.0
Grain Truck Loadout (P6A)	336	64.3
Enclosed Reclaim Conveyor Leg (P6B)	850	75.5
North Merchandising House Receiving (P7)	336	64.3
North Merchandising House Conveying (P8)	336	64.3
North Merchandising House Enclosed Conveying (P8B)	500	69.0
North Merchandising House Loadout (P9)	375	65.6
North Merchandising House Loadout (Hopper Truck - P9B)	375	68.0
Grain Storage Bin (P10)	12.5	22.3
Grain Storage Bin Conveyor (P10A)	336	64.3

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

$$E = 4.1 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}$$

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

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

- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), when the process weight rate exceeds two hundred (200) tons per hour, the allowable emissions may exceed that shown in the table in 326 IAC 6-3-2(e) provided the concentration of particulate in the discharge gases to the atmosphere is less than one tenth (0.10) pound per one thousand (1,000) pounds of gases.

Change No. 9 Several conditions in Section D of the permit have been updated to be the current standard language for Part 70 Permits.

- Preventive Maintenance Plan: On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions.
- IDEM, OAQ has added the requirements for bag failure in multi-compartment baghouses.
- IDEM, OAQ has decided to clarify what rule requirements a certification needs to meet throughout the permit.
- 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official."
- IDEM, OAQ 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 timeline have been switched to "no later than" or "not later than", unless the rule specifically states "within".
- Testing requirements were updated to include PM_{2.5} and to remove the deadline for the initial performance test since this testing has already occurred.
- IDEM, OAQ has clarified the "normal range" for baghouse parametric monitoring.
- IDEM, OAQ has clarified that the Broken or Failed Bag Detection condition addresses the requirements for single compartment baghouses.
- The record keeping and reporting requirements were clarified to say "to document **the** compliance **status** with ...".
- IDEM, OAQ has clarified the record keeping requirements with regard to pressure drop readings.

D.1.4 D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(4312)]

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

D.1.5 D.1.4 Particulate Control

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- (a) The baghouses, telescoping spouts and spout extensions for particulate control shall be in operation or in place at all times when P1A, P1B, P1C, P3, P5 and P6A, are in operation.
- (b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

~~D.1.6~~ **D.1.5** Testing Requirements [326 IAC 2-7-6(1),~~(4),(6)~~] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1 and ~~D.1.3~~ **D.1.2**, the Permittee shall perform ~~PM/~~ **PM₁₀** testing for baghouse C-1 used in conjunction with the Truck Only Receiving Area (P-1), including Receiving Pits (P1A & P1B) and Conveyor Leg (P1D), baghouse C-3 used in conjunction with the Receiving Pit (P1C), and baghouse C-2 used in conjunction with the ~~the~~ Grain Storage/Handling Areas (P3), ~~within 60 days after achieving maximum production capacity, but no later than 180 days after initial startup, utilizing methods as approved by the Commissioner).~~ **PM₁₀ includes filterable and condensable PM.**

~~These tests~~ **Testing** shall be repeated at least once every five (5) years from the date of ~~this~~ **the most recent** valid compliance demonstration. ~~Testing shall be conducted in accordance with Section C – Performance Testing. PM₁₀ includes filterable and condensable PM₁₀.~~ **contains the Permittee's obligations with regard to the testing required by this condition.**

~~D.1.7~~ **D.1.6** Visible Emissions Notations [40 CFR 64] [326 IAC 3-8]

- (a) Visible emission notations of the stacks exhausts from baghouse C-1 controlling Truck Only Receiving, identified as P-1 (P1A & P1B) and Conveyor Leg (P1D), baghouse C-2 controlling Grain Storage/Handling Areas, identified as P3 and baghouse C-3 controlling Receiving Pit, identified as P1C, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take ~~a~~ reasonable response ~~steps in accordance with Section C – Response to Excursions or Exceedances.~~ Failure to take response steps ~~in accordance with Section C – Response to Excursions or Exceedances~~ shall be considered a deviation from this permit. **Section C – Response to Excursions and Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition.**

~~D.1.8~~ **D.1.7** Baghouses Parametric Monitoring [40 CFR 64] [326 IAC 3-8]

- (a) The Permittee shall record the pressure drop across baghouse C-1 controlling the Truck Only Receiving Area, identified as P-1 (P1A & P1B) and Conveyor Leg (P1D); baghouse C-2, controlling Grain Storage/Handling Areas, identified as P3, and baghouse C-3 controlling Receiving Pit, identified as P1C, at least once per day when the respective emission unit is in operation.

- (b) When, for any one reading, the pressure drop across ~~each~~**the** baghouse is outside of the normal range of 1.0 and 6.0 inches of water or a range established during the last stack test, the Permittee shall take a reasonable response steps in accordance with ~~Section C - Response to Excursions or Exceedances~~. **The normal range for this unit is a pressure drop between 1.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test.** A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with ~~Section C - Response to Excursions or Exceedances~~, shall be considered a deviation from this permit. **Section C - Response to Excursions or Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition.**
- (c) The instruments used for determining the pressure shall comply with Section C - Instrument Specifications of this permit, and shall be calibrated **or replaced** at least once every six (6) months.

~~D.1.9~~ **D.1.8 Broken or Failed Bag Detection - Single Compartment Baghouses [40 CFR 64] [326 IAC 3-8]**

In the event that bag failure has been observed:

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

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

~~D.1.10~~ **D.1.9 Record Keeping Requirements**

- (a) To document **the compliance status** with Condition ~~D.1.7~~ **D.1.6**, the Permittee shall maintain a daily record of visible emission notations of the stacks exhausts from baghouse C-1 controlling Truck Only Receiving, identified as P-1 (P1A & P1B) and Conveyor Leg (P1D), baghouse C-2 controlling Grain Storage/Handling Areas, identified as P3 and baghouse C-3 controlling Receiving Pit, identified as P1C. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (b) To document **the compliance status** with Condition ~~D.1.8~~ **D.1.7**, the Permittee shall maintain a daily record of the pressure drop across each of the baghouses controlling the Truck Only Receiving, identified as P-1 (P1A & P1B) and Conveyor Leg (P1D), Receiving Pit, identified as P1C, and the Grain Storage/Handling Areas, identified as P3. **The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading (e.g. the process did not operate that day).**
- (c) To document **the compliance status** with Condition D.1.1, the Permittee shall maintain monthly records of the grain throughput to the merchandising emission units.

- (d) ~~To document compliance with Condition D.1.2, the Permittee shall maintain monthly records of the natural gas fired to the two grain dryers, identified as P4 and P4A.~~
- (e) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of~~ **contains the Permittee's obligations with regard to the record keeping required by this permit-condition.**

~~D.1.11~~ **D.1.10 Reporting Requirements**

- (a) ~~A monthly summary of the information to document the compliance status with Condition D.1.1, shall be submitted quarterly to the addresses 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 not later than thirty (30) days after following the end of the each calendar quarter being reported.~~
- (b) ~~A monthly summary of the information to document compliance with Condition D.1.2, shall be submitted quarterly to the addresses 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 thirty (30) days after the end of the quarter being reported.~~

The reports submitted by the Permittee does require ~~the~~ a certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "responsible official" as defined by 326 IAC 2-7-1(34). **Section C - General Reporting Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.**

~~Part 70 Quarterly Report~~

Facility: ~~Grain Dryers (P4 & P4A)~~
Parameter: ~~Natural Gas Fuel Usage for NO_x limit~~
Limit: ~~Condition D.1.2(c) - Shall not exceed 504 million cubic feet per twelve (12) consecutive month period, with compliance at the end of each month.~~

Change No. 10 IDEM, OAQ has decided to remove the last sentence dealing with the need for certification from the forms because the Conditions requiring the forms already address this issue.

EMERGENCY OCCURRENCE REPORT

~~A certification is not required for this report.~~

Change No. 11 IDEM, OAQ has decided to remove the last sentence dealing with the need for certification from the forms because the Conditions requiring the forms already address this issue.

~~Part 70 Usage Quarterly Submittal Report~~

~~Attach a signed certification to complete this report~~

Change No. 12 IDEM, OAQ has updated the Quarterly Deviation and Compliance Monitoring Report as follows:

- IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.
- The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.
- IDEM, OAQ has decided to remove the last sentence dealing with the need for certification from the forms because the Conditions requiring the forms already address this issue.

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

This report shall be submitted quarterly based on a calendar year. **Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C – General Reporting.** Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

~~Attach a signed certification to complete this report.~~

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification and Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 16, 2011. Additional information was received on March 8, 2012, May 1, 2012, and July 13, 2012.

Conclusion

The construction of the new dryer and operation of this stationary grain merchandising plant shall be subject to the conditions of the attached Part 70 Operating Permit No. T129-31275-00014.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Kimberly Cottrell at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0870 or toll free at 1-800-451-6027 extension 3-0870.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>

- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

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

Appendix A – Emission Calculations
Technical Support Document (TSD)
Significant Source Modification
and Part 70 Operating Permit

Source Description and Location

Company Name: Consolidated Grain & Barge, Co.
Address City IN Zip: 2801 Bluff Road, Mt. Vernon, Indiana 47620
County: Posey
SIC Code: 5153
Significant Source Modification No.: 129-31795-00014
Part 70 Operating Permit No.: T129-31275-00014
Reviewer: Kimberly Cottrell
Date: August 10, 2012

Unrestricted Potential to Emit

Process	CO	NO _x	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO _{2e}	Hex.	Total HAP
Truck Receiving and Receiving Pit (P1A & P1B)	--	--	827.82	271.34	45.99	--	--	--	--	--
Truck Receiving and Receiving Pit (P1C)	--	--	827.82	271.34	45.99	--	--	--	--	--
Conveyor Leg (P1D)	--	--	187.03	104.24	17.78	--	--	--	--	--
Rail/HB and Hopper Truck Receiving (P2)	--	--	64.39	14.35	2.39	--	--	--	--	--
Grain Handling (P3)	--	--	336.65	187.64	32.01	--	--	--	--	--
Grain Dryer (P4)	--	--	135.87	33.97	5.81	--	--	--	--	--
Grain Dryer (P4A)	--	--	101.18	25.29	4.32	--	--	--	--	--
Grain Barge Loadout (P5)	--	--	35.04	8.76	1.20	--	--	--	--	--
Grain Truck Loadout (P6A)	--	--	126.56	42.68	7.21	--	--	--	--	--
Enclosed Reclaim Conveyor Leg (P6B)	--	--	227.10	126.58	21.59	--	--	--	--	--
North Merchandising House Receiving (P7)	--	--	51.51	11.48	1.91	--	--	--	--	--
North Merchandising House Conveying (P8)	--	--	89.77	50.04	8.54	--	--	--	--	--
North Merchandising House Enclosed Conveying (P8B)	--	--	133.59	74.46	12.70	--	--	--	--	--
North Merchandising House Loadout (P9)	--	--	141.26	47.63	8.05	--	--	--	--	--
North Merchandising House Loadout (Hopper Truck - P9B)	--	--	173.65	58.56	9.89	--	--	--	--	--
Grain Storage Bin (P10)	--	--	1.37	0.34	0.06	--	--	--	--	--
Grain Storage Bin Conveyor (P10A)	--	--	89.77	50.04	8.54	--	--	--	--	--
Grain Storage Ring/Pad (P9B)	--	--	1.01	0.35	0.35	--	--	--	--	--
Grain Dryer (P4) - NG combustion	16.59	19.75	0.38	1.50	1.50	0.12	1.09	23,848	0.36	0.37
Grain Dryer (P4A) - NG combustion	7.79	9.28	0.18	0.70	0.70	0.06	0.51	11,198	0.17	0.18
Total Unrestricted PTE	24.38	29.03	3,552	1,381	236.55	0.17	1.60	35,046	0.52	0.55

Limited Potential to Emit

Process	CO	NO _x	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO _{2e}	Hex.	Total HAP
Truck Receiving and Receiving Pit (P1A & P1B)	--	--	5.63	36.88	45.99	--	--	--	--	--
Truck Receiving and Receiving Pit (P1C)	--	--	5.63	36.88	45.99	--	--	--	--	--
Conveyor Leg (P1D)	--	--	3.20	35.70	17.78	--	--	--	--	--
Rail/HB and Hopper Truck Receiving (P2)	--	--	27.58	6.15	2.39	--	--	--	--	--
Grain Handling (P3)	--	--	3.20	35.70	32.01	--	--	--	--	--
Grain Dryer (P4)	--	--	24.75	6.19	5.81	--	--	--	--	--
Grain Dryer (P4A)	--	--	44.00	11.00	4.32	--	--	--	--	--
Grain Barge Loadout (P5)	--	--	12.80	3.20	1.20	--	--	--	--	--
Grain Truck Loadout (P6A)	--	--	33.54	18.85	7.21	--	--	--	--	--
Enclosed Reclaim Conveyor Leg (P6B)	--	--	10.98	10.20	21.59	--	--	--	--	--
North Merchandising House Receiving (P7)	--	--	4.90	1.09	1.91	--	--	--	--	--
North Merchandising House Conveying (P8)	--	--	8.54	4.76	8.54	--	--	--	--	--
North Merchandising House Enclosed Conveying (P8B)	--	--	8.54	4.76	12.70	--	--	--	--	--
North Merchandising House Loadout (P9)	--	--	12.04	4.06	8.05	--	--	--	--	--
North Merchandising House Loadout (Hopper Truck - P9B)	--	--	12.04	4.06	9.89	--	--	--	--	--
Grain Storage Bin (P10)	--	--	1.37	0.34	0.06	--	--	--	--	--
Grain Storage Bin Conveyor (P10A)	--	--	7.32	6.80	8.54	--	--	--	--	--
Grain Storage Ring/Pad (P9B)	--	--	1.01	0.35	0.35	--	--	--	--	--
Grain Dryer (P4) - NG combustion	16.59	19.75	0.38	1.50	1.50	0.12	1.09	23,848	0.36	0.37
Grain Dryer (P4A) - NG combustion	7.79	9.28	0.18	0.70	0.70	0.06	0.51	11,198	0.17	0.18
Total Limited PTE	24.38	29.03	227.61	229.17	236.55	0.17	1.60	35,046	0.52	0.55

Part 70 Major Source Threshold	100	100	100	100	100	100	100	100,000	10	25
PSD Major Source Threshold	250	250	250	250	250	250	250	100,000	NA	NA

Grain Dryer (P4) Modification - 2012

Grain Processing Emissions

Process	Annual Throughput		Process Weight Rate Calculation	Emission Factors			Control Device / Control Measure	Control Efficiency %	Unrestricted Potential to Emit			Limited Emissions		
				PM	PM ₁₀	PM _{2.5}			PM	PM ₁₀	PM _{2.5}	PM	PM ₁₀	PM _{2.5}
	LTD ton/yr	MAX ton/yr	lb/hr	lb/ton	lb/ton	lb/ton	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	
OLD Grain Dryer (P4)	160,000	84	49.54	0.22	0.055	0.0094	NA		80.94	20.24	3.46	17.60	4.40	0.75
NEW Grain Dryer (P4)	225,000	141	54.79	0.22	0.055	0.0094	NA		135.87	33.97	5.81	24.75	6.19	5.81

Notes
 Emission factors are from AP-42 Table 9.9-1-1.
 NEW Capacity: 4,700 bushels/hr
 60 lb/bu whole grain - corn, soybeans, wheat, & milo
 141 ton/hr

Methodology
 Process Weight Rate (>60,000 lb/hr throughput) = $E = 55 \times P^{0.11} - 40$ where: E = Rate of Emissions (lb/hr)
 P = Process Weight Rate (ton/hr)

Unrestricted Potential to Emit (tons/yr) = Maximum Throughput (ton/hr) x 8760 hr/yr x Emission Factor (lb/ton grain) / 2000 lb/ton
 Controlled & Limited Emissions (ton/yr) = Limited Throughput (ton/yr) x Emission Factor (lb/ton grain) / 2000 lb/ton x (1 - CE (%))

Grain Dryers (Natural Gas Combustion <100 MMBtu/hr)

	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Notes
OLD Grain Dryer (P4) - NG combustion	36.0	309.2	All emission factors are based on normal firing. MMBtu = 1,000,000 Btu MMCF = 1,000,000 Cubic Feet of Gas
NEW Grain Dryer (P4) - NG combustion	46.0	395.1	

	Pollutant										
	CO	NO _x	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO ₂	CH ₄	N ₂ O	CO ₂ e
Emission Factor in lb/MMCF	84.0	100.0	1.9	7.6	7.6	0.6	5.5	120,000	2.3	2.2	
								1	21	310	= GWP
OLD Grain Dryer (P4) PTE(tons/yr)	12.99	15.46	0.29	1.17	1.17	0.09	0.85	18,551	0.36	0.34	18,663
NEW Grain Dryer (P4) PTE(tons/yr)	16.59	19.75	0.38	1.50	1.50	0.12	1.09	23,704	0.45	0.43	23,848

Notes
 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
 PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM₁₀ combined.
 PM_{2.5} emission factor is filterable and condensable PM_{2.5} combined.
 Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32
 The N₂O Emission Factor for uncontrolled is 2.2. The N₂O Emission Factor for low NO_x burner is 0.64.
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Methodology
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO₂e (tons/yr) = CO₂ Potential Emission ton/yr x CO₂ GWP (1) + CH₄ Potential Emission ton/yr x CH₄ GWP (21) + N₂O Potential Emission ton/yr x N₂O GWP (310).

Grain Dryer (P4) Modification - 2012

	HAPs - Organics					HAPs - Metals					Total
	Benzene	Dichloro-benzene	Formal-dehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.80	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
OLD Grain Dryer (P4) PTE(tons/yr)	3.2E-04	1.9E-04	1.2E-02	0.28	5.3E-04	7.7E-05	1.7E-04	2.2E-04	5.9E-05	3.2E-04	0.29
NEW Grain Dryer (P4) PTE(tons/yr)	4.1E-04	2.4E-04	1.5E-02	0.36	6.7E-04	9.9E-05	2.2E-04	2.8E-04	7.5E-05	4.1E-04	0.37

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

Grain Dryer P4	CO	NO _x	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO ₂ e	Hex.	Total HAP
Unrestricted PTE	16.59	19.75	136.24	35.47	7.31	0.12	1.09	23,848	0.36	0.37

Grain Processing Emissions

Process	Annual Throughput		Process Weight Rate Calculation	Emission Factors			Control Device / Control Measure	Control Efficiency %	Unrestricted Potential to Emit			Controlled Emissions			Limited Emissions		
				PM	PM ₁₀	PM _{2.5}			PM	PM ₁₀	PM _{2.5}	PM	PM ₁₀	PM _{2.5}	PM	PM ₁₀	PM _{2.5}
	LTD ton/yr	MAX ton/yr	lb/hr	lb/ton	lb/ton	lb/ton	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	
Truck Receiving and Receiving Pit (P1A & P1B)	1,250,000	1,050	78.22	0.18	0.059	0.010	Baghouse C-1	95%	827.82	271.34	45.99	41.39	13.57	2.30	5.63	36.88	45.99
Truck Receiving and Receiving Pit (P1C)	1,250,000	1,050	78.22	0.18	0.059	0.010	Baghouse C-3	95%	827.82	271.34	45.99	41.39	13.57	2.30	5.63	36.88	45.99
Conveyor Leg (P1D)	2,100,000	700	73.06	0.061	0.034	0.0058	Baghouse C-1	95%	187.03	104.24	17.78	9.35	5.21	0.89	3.20	35.70	17.78
Rail/HB and Hopper Truck Receiving (P2)	1,576,000	420	66.89	0.035	0.0078	0.0013	NA		64.39	14.35	2.39	64.39	14.35	2.39	27.58	6.15	2.39
Grain Handling (P3)	2,100,000	1,260	80.62	0.061	0.034	0.0058	Baghouse C-2	95%	336.65	187.64	32.01	16.83	9.38	1.60	3.20	35.70	32.01
Grain Dryer (P4)	225,000	141	54.79	0.22	0.055	0.0094	NA		135.87	33.97	5.81	135.87	33.97	5.81	24.75	6.19	5.81
Grain Dryer (P4A)	400,000	105	51.77	0.22	0.055	0.0094	NA		101.18	25.29	4.32	101.18	25.29	4.32	44.00	11.00	4.32
Grain Barge Loadout (P5)	1,600,000	500	68.96	0.016	0.004	0.00055	NA		35.04	8.76	1.20	35.04	8.76	1.20	12.80	3.20	1.20
Grain Truck Loadout (P6A)	1,300,000	336	64.29	0.086	0.029	0.0049	Spout Extension	40%	126.56	42.68	7.21	75.94	25.61	4.33	33.54	18.85	7.21
Enclosed Reclaim Conveyor Leg (P6B)	600,000	850	75.50	0.061	0.034	0.0058	Enclosure	40%	227.10	126.58	21.59	136.26	75.95	12.96	10.98	10.20	21.59
North Merchandising House Receiving (P7)	280,000	336	64.29	0.035	0.0078	0.0013	NA		51.51	11.48	1.91	51.51	11.48	1.91	4.90	1.09	1.91
North Merchandising House Conveying (P8)	280,000	336	64.29	0.061	0.034	0.0058	NA		89.77	50.04	8.54	89.77	50.04	8.54	8.54	4.76	8.54
North Merchandising House Enclosed Conveying (P8B)	280,000	500	68.96	0.061	0.034	0.0058	NA		133.59	74.46	12.70	133.59	74.46	12.70	8.54	4.76	12.70
North Merchandising House Loadout (P9)	280,000	375	65.56	0.086	0.029	0.0049	NA		141.26	47.63	8.05	141.26	47.63	8.05	12.04	4.06	8.05
North Merchandising House Loadout (Hopper Truck - P9B)	280,000	461	67.99	0.086	0.029	0.0049	NA		173.65	58.56	9.89	173.65	58.56	9.89	12.04	4.06	9.89
Grain Storage Bin (P10)	109,500	12.5	22.27	0.025	0.0063	0.0011	NA		1.37	0.34	0.06	1.37	0.34	0.06	1.37	0.34	0.06
Grain Storage Bin Conveyor (P10A)	400,000	336.0	64.29	0.061	0.034	0.0058	Enclosure	40%	89.77	50.04	8.54	53.86	30.02	5.12	7.32	6.80	8.54
Total PTE									3,550.37	1,378.74	233.99	1,303	498.19	84.37	226.05	226.61	233.99

Notes

Emission factors are from AP-42 Table 9.9.1-1.
 Control Efficiencies for the Grain Truck Loadout (P6A) and Enclosed Reclaim Conveyor Leg (P6B) were established under good engineering judgement in the initial FESOP F129-15422-00014, issued on June 26, 2002.
 The Grain Storage Bin Conveyor (P10A) is similar to the Reclaim Conveyor; therefore, the same control efficiency will be used.

Methodology

Process Weight Rate (<60,000 lb/hr throughput) = $E = 4.1 \times P^{0.67}$ where: E = Rate of Emissions (lb/hr)
 Process Weight Rate (>60,000 lb/hr throughput) = $E = 55 \times P^{0.11} - 40$ P = Process Weight Rate (ton/hr)

Unrestricted Potential to Emit (tons/yr) = Maximum Throughput (ton/hr) x 8760 hr/yr x Emission Factor (lb/ton grain) / 2000 lb/ton
 Controlled & Limited Emissions (ton/yr) = Limited Throughput (ton/yr) x Emission Factor (lb/ton grain) / 2000 lb/ton x (1 - CE (%))

Grain Dryers (Natural Gas Combustion <100 MMBtu/hr)

	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
Grain Dryer (P4) - NG combustion	46.0	395.1
Grain Dryer (P4A) - NG combustion	21.6	185.5

	Pollutant										
	CO	NO _x	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO ₂	CH ₄	N ₂ O	CO ₂ e
Emission Factor in lb/MMCF	84.0	100.0	1.9	7.6	7.6	0.6	5.5	120,000	2.3	2.2	
								1	21	310	= GWP
Grain Dryer (P4) PTE (tons/yr)	16.6	19.8	0.4	1.5	1.5	0.1	1.1	23,704	0.5	0.4	23,848
Grain Dryer (P4A) PTE (tons/yr)	7.79	9.28	0.18	0.70	0.70	0.06	0.51	11,130	0.21	0.20	11,198
Total PTE (tons/yr)	24.38	29.03	0.55	2.21	2.21	0.17	1.60	34,834	0.67	0.64	35,046

Notes

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

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

PM_{2.5} emission factor is filterable and condensable PM_{2.5} combined.

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

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

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

Methodology

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

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

	HAPs - Organics					HAPs - Metals					Total
	Benzene	Dichloro-benzene	Formal-dehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.80	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Grain Dryer (P4) PTE (tons/yr)	4.1E-04	2.4E-04	1.5E-02	0.36	6.7E-04	9.9E-05	2.2E-04	2.8E-04	7.5E-05	4.1E-04	0.37
Grain Dryer (P4A) PTE(tons/yr)	1.9E-04	1.1E-04	7.0E-03	0.17	3.2E-04	4.6E-05	1.0E-04	1.3E-04	3.5E-05	1.9E-04	0.18
Total PTE (tons/yr)	6.10E-04	3.48E-04	2.18E-02	0.52	9.87E-04	1.45E-04	3.19E-04	4.06E-04	1.1E-04	6.10E-04	0.55

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Grain Storage Ring/Pad (P9B)

Material Storage Piles (AP-42 Section 11.2.3)

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8,760 hours of use and USEPA's AP-42 (Pre 1983 Edition), Section 11.2.3.

$$E_f = 1.7 \cdot (s/1.5) \cdot (365-p) / 235 \cdot (f/15)$$

where E_f = emission factor (lb/acre/day)

s = silt content (wt %) --- as grain dust

p = 125 days of rain greater than or equal to 0.01 inches

f = 15 % of wind greater than or equal to 12 mph

Storage Pile*	Materials	Worst Case Grain Dust wt. %	Emission Factor lb/acre/day	Maximum Anticipated acres	Unrestricted Potential to Emit			Dust Control Measure	Control Efficiency %	Controlled Emissions		
					PM ton/yr	PM ₁₀ ton/yr	PM _{2.5} ton/yr			PM ton/yr	PM ₁₀ ton/yr	PM _{2.5} ton/yr
Open Rectangular Storage Area	whole grain - corn, soybeans, wheat, & milo	4.6	5.32	1.04	1.01	0.35	0.35	covered pile	90%	0.10	0.04	0.04

Notes

Diameter of Storage Ring/Pad = 240 feet
 Storage Area = 45,216 ft²

Maximum Storage Capacity = 1,000,000 bushels of grain
 30,000 tons of grain

Conversion Factors: 60 lb/bushel U.S. Grains Council
 43,560 ft²/acre

Methodology

Worst case silt content values are from AP-42 Table 13.2.4-1 (dated 11/2006)

Maximum pile size (acres) provided by the source

Unlimited PTE of PM₁₀/PM_{2.5} (tons/yr) = (Potential PM Emissions (tons/yr)) x 35% (Based on calculation for similar process at ADM Grain Company (F073-31260-00021, i

Control Efficiency is from WRAP Fugitive Dust Handbook, Table 9-4; November 15, 2004.

Unrestricted Potential to Emit (tons/yr) = Emission Factor (lb/acre/day) x Maximum Pile Size (acres) x (1 ton/2000 lbs) x (8760 hours/yr)

Controlled Potential to Emit (ton/yr) = Unrestricted Potential to Emit (ton/yr) x (1 - CE (%))

Fugitive Emissions Paved Roads

According to AP-42, Chapter 13.2.1 - Paved Roads (1/11), the particulate emission factors for paved roads can be estimated from the following equation:

$$EF = [k (sL)^{0.91} (W)^{1.02}] (1 - (P/4N))$$

where: EF = Emission Factor lbs/VMT

k = Particle Size Multiplier for Paved Road Equation

0.011 PM 0.0022 PM₁₀ 0.00054 PM_{2.5}

sL = Road Surface Silt Loading (grams per square meter (g/m²) 2.9 (g/m²) (AP-42, Table 13.2.1-3)

W = average weight (tons) of vehicles traveling the road. 40.0

P = number of days with at least 0.01 in of precipitation during averaging period 120

N = number of days in the averaging period (e.g. 365 for annua 365

Vehicle Type	Average Vehicle Weight	Total Trip Number *	Round Trip Distance *	Vehicle Mile Traveled (VMT)	Traffic Component*	Component Vehicle Weight	PM Emission Factor (non-winter)	PM ₁₀ Emission Factor (non-winter)	PM _{2.5} Emission Factor (non-winter)	PM Emissions	PM ₁₀ Emissions	PM _{2.5} Emissions
	<i>tons</i>	<i>trips/yr</i>	<i>miles/trip</i>	<i>miles/yr</i>	<i>%</i>	<i>tons</i>	<i>lb/mile</i>	<i>lb/mile</i>	<i>lb/mile</i>	<i>ton/yr</i>	<i>ton/yr</i>	<i>ton/yr</i>
Grain Receiving	40.0	73,000	0.50	36,500	100%	40.0	1.15	0.23	0.06	20.91	4.18	1.03
Total				36,500	100%	40.0				20.91	4.18	1.03

* This information is provided by the source.

Methodology

Component Vehicle Weight = Ave. Vehicle Weight (tons) x Traffic Component (%)
 (Note that the summation of the component vehicle weight equals the Mean Vehicle Weight.)
 VMT (miles/yr) = Round Trip Distance (miles/trip) x Total Trip Numbers (trips/yr)
 Potential to Emit (tons/yr) = VMT (miles/yr) x Emission Factors (lb/mile) / 2000 lb/ton



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Donnie Love
Consolidated Grain & Barge, Co
P.O. Box 547
Mount Vernon, IN 47620

DATE: September 17, 2012

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

SUBJECT: Final Decision
Title V - Renewal
129-31275-00014

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:
Leland Hartstack (Manager)
Carl Corrigan (CG&B)
Don Robin (ERM)
Debra Chelf (ERM)
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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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September 17, 2012

TO: Alexandrian Public Library

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

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

Applicant Name: Consolidated Grain & Barge, Co
Permit Number: 129-31275-00014

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	MIDENNEY 9/17/2012 Consolidated Grain & Barge Company 129-31275-00014 & 129-31795-00014(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		Donnie Love Consolidated Grain & Barge Company PO Box 547 Mount Vernon IN 47620 (Source CAATS) Via Confirm Delivery										
2		Leland Hartstack Mgr Consolidated Grain & Barge Company 2801 Bluff Rd Mount Vernon IN 47620 (RO CAATS)										
3		Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
4		Posey County Commissioners County Courthouse, 126 E. 3rd Street Mount Vernon IN 47620 (Local Official)										
5		Posey County Health Department 126 E. 3rd St, Coliseum Bldg Mount Vernon IN 47620-1811 (Health Department)										
6		Mount Vernon City Council and Mayors Office 520 Main Street Mount Vernon IN 47620 (Local Official)										
7		Dr. Jeff Seyler Univ. of So Ind., 8600 Univ. Blvd. Evansville IN 47712 (Affected Party)										
8		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)										
9		Alexandrian Public Library 115 West 5th Mt. Vernon IN 47620 (Library)										
10		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)										
11		Mrs. Connie Parkinson 510 Western Hills Dr. Mt. Vernon IN 47620 (Affected Party)										
12		Robert Hess c/o Mellon Corporation 830 Post Road East, Suite 105 Westport CT 06880 (Affected Party)										
13		Juanita Burton 7911 W. Franklin Road Evansville IN 47712 (Affected Party)										
14		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
15		Don Robin Environmental Resources Management (ERM) 11350 N. Meridian, Ste 320 Carmel IN 46032 (Consultant)										

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1		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)										
2		Debra Chelf Environmental Resources Management (ERM) Fidelity Plaza Tower Two 13350 N Meridian St. 220 Carmel IN 46032 (Consultant)										
3		Mr. Carl Corrigan Consolidated Grain & Barge Company P.O. Box 547 Mt. Vernon IN 47620 (Source – addl contact)										
4												
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