



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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[www.idem.IN.gov](http://www.idem.IN.gov)

February 10, 2012

Ken Trompeter  
MGPI of Indiana, LLC  
1300 Main St  
Atchinson, KS 66002-0130

Re: Permit By Rule Status  
139-31313-00015

Dear Ken Trompeter:

On March 1, 2010, Lotus Grain was issued a Permit By Rule status for a stationary grain elevator located at 1768 W US 52, Rushville, Indiana 46173. On December 28, 2011, MGPI of Indiana, LLC submitted an application stating that effective December 27, 2011 Lotus Grain had changed their company name to MGPI of Indiana, LLC and MGPI of Indiana, LLC will continue to operate the grain elevator under the criteria of provision 326 IAC 2-11 (Permit by Rule for Specific Source Categories). Based on information submitted and the provisions of 326 IAC 2-11 (Permit by Rule for Specific Source Categories), MGPI of Indiana, LLC, formerly known as Lotus Grain, is now operating under Permit by Rule (PBR) Status. This PBR supersedes PBR No. 139-28939-00015, issued on March 1, 2010.

- (1) Pursuant to 326 IAC 2-11-1 (General Provisions) and 326 IAC 2-11-3 (Permit by Rule for Grain Elevators):
  - (a) This source shall comply with the following:
    - (1) This grain elevator receives grain by truck and/or rail and ships grain by truck and/or rail. To limit allowable emissions or potential to emit as provided in 326 IAC 2-11-1(c), the annual total throughput limits shall be equal to or less than eleven million two hundred thousand (11,200,000) bushels. [326 IAC 2-11-3(b)(1)]
    - (2) This source shall operate and properly maintain air pollution control devices at the source. [326 IAC 2-11-1(g)(1)]
    - (3) this source shall follow generally accepted industry work practices to minimize emissions of regulated air pollutants. [326 IAC 2-11-1(g)(2)]
    - (4) the source shall not discharge air pollutants so as to create a public nuisance. [326 IAC 2-11-1(g)(3)]
  - (b) A source complying with 326 IAC 2-11 is not subject to 326 IAC 2-6.1 unless otherwise required by law. A source complying with 326 IAC 2-11 is not subject to 326 IAC 2-5.1 or 326 IAC 2-7 provided the rule limits the sources allowable emissions or potential to emit below the applicability thresholds for 326 IAC 2-5.1 or 326 IAC 2-7. [326 IAC 2-11-1(c)]
  - (c) A source complying with 326 IAC 2-11 may at any time apply for a permit under 326 IAC 2-5.1, 326 IAC 2-6.1, 326 IAC 2-7, 326 IAC 2-8 or an operating agreement under 326 IAC 2-9 as applicable. [326 IAC 2-11-1(d)]

- (d) Before a source subject to 326 IAC 2-11 modifies its facility or operations in such a way that it will no longer comply with 326 IAC 2-11, it shall obtain the appropriate approval from the commissioner under 326 IAC 2-5.1, 326 IAC 2-6.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7 or 326 IAC 2-8. [326 IAC 2-11-1(e)]
- (e) No later than thirty (30) days after receipt of a written request by the Department of Environmental Management, Office of Air Quality (OAQ), or the U.S. EPA, the owner or operator of the source shall demonstrate that the source is in compliance with the limits of 326 IAC 2-11, by providing throughput records for the previous twelve (12) months. [326 IAC 2-11-1(f)]
- (f) This Permit by Rule Status does not relieve the source of the responsibility to comply with the provisions of any applicable federal, state or local requirements, such as New Source Performance Standards (NSPS), 40 CFR Part 60, or National Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61 or 40 CFR Part 63. [326 IAC 2-11-1(h)]
- (g) Pursuant to 326 IAC 2-11-1(i), a source subject to 326 IAC 2-11 may be subject to applicable requirements for a major source, including 326 IAC 2-7, if:
  - (1) at any time the source is not in compliance with the conditions provided in an applicable section of 326 IAC 2-11; or
  - (2) the source does not timely or adequately demonstrate compliance with the conditions in an applicable section of 326 IAC 2-11.
- (h) Any violation of 326 IAC 2-11 may result in administrative or judicial enforcement proceedings and penalties under IC 13-30-3. [326 IAC 2-11-1(j)]

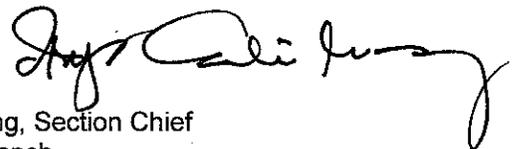
IDEM, OAQ has decided to make additional revisions to the Permit By Rule status as described below. The registration has been revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

- (2) Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit 100,000 tons per year or more of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e). Therefore, CO<sub>2</sub>e emissions have been calculated for this source. Based on the calculations the unlimited potential to emit greenhouse gases from the entire source is less than 100,000 tons of CO<sub>2</sub>e per year (see Appendix A for detailed calculations). This did not require any changes to the permit.

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

If you have any questions on this matter, please contact Marcia Earl, of my staff, at 317-233-0863 or 1-800-451-6027, and ask for extension 3-0863.

Sincerely,



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

IC/me

MGPI, Inc  
Rushville, Indiana  
Permit Reviewer: Marcia Earl

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PBR 139-31313-00015

cc: File - Rush County  
Rush County Health Department  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** MGPI of Indiana, LLC  
**Address City IN Zip:** 1768 W US 52, Rushville, Indiana 46173  
**Permit Number:** 139-31313-00015  
**Reviewer:** Marcia Earl  
**Date:** February 2012

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
18.3	1000	159.87

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.15	0.61	0.61	0.05	7.99	0.44	6.71

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80E+00	Toluene 3.40E-03
Potential Emission in tons/yr	1.68E-04	9.59E-05	6.00E-03	0.14	2.72E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03
Potential Emission in tons/yr	4.00E-05	8.79E-05	1.12E-04	3.04E-05	1.68E-04

**TOTAL HAPs 0.15**

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**Greenhouse Gas Emissions**

**Company Name: MGPI of Indiana, LLC**  
**Address City IN Zip: 1768 W US 52, Rushville, Indiana 46173**  
**Permit Number: 139-31313-00015**  
**Reviewer: Marcia Earl**  
**Date: February 2012**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
18.25	1000	159.87

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	9,592	0.2	0.2
Summed Potential Emissions in tons/yr	9,593		
CO2e Total in tons/yr	9,651		

**Methodology**

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

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

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

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

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

# Mail Code 61-53

IDEM Staff	MIDENNEY 2/10/2012 MGPI of Indiana, LLC 139-31313-00015 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Ken Trompeter MGPI of Indiana, LLC 1300 Main St Atchison KS 66002-0130 (Source CAATS)										
2		David Rindom VP MGPI of Indiana, LLC 100 Commercial St Atchison KS 66002-130 (RO CAATS)										
3		Rush County Commissioners 101 East Second Street Rushville IN 46173 (Local Official)										
4		Rush County Health Department Courthouse, Room 5 Rushville IN 46173-1854 (Health Department)										
5		Rushville Town Council 133 W. First St. Rushville IN 46173 (Local Official)										
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