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: October 17, 2012

RE: ADM Grain Company / 163-31595-00042

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 according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

ADM Grain Company
2350 Broadway Avenue
Evansville, Indiana 47712

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

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

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

Operation Permit No.: M163-31595-00042	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 17, 2012 Expiration Date: October 17, 2022

TABLE OF CONTENTS

A. SOURCE SUMMARY 4
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]
A.2 Emission Units and Pollution Control Equipment Summary

B. GENERAL CONDITIONS 7
B.1 Definitions [326 IAC 2-1.1-1]
B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
B.3 Term of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability
B.5 Severability
B.6 Property Rights or Exclusive Privilege
B.7 Duty to Provide Information
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]
B.9 Preventive Maintenance Plan [326 IAC 1-6-3]
B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]
B.12 Permit Renewal [326 IAC 2-6.1-7]
B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]
B.14 Source Modification Requirement
B.15 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]
B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]
B.17 Annual Fee Payment [326 IAC 2-1.1-7]
B.18 Credible Evidence [326 IAC 1-1-6]

C. SOURCE OPERATION CONDITIONS 12

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]
C.1 Permit Revocation [326 IAC 2-1.1-9]
C.2 Opacity [326 IAC 5-1]
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
C.5 Fugitive Dust Emissions [326 IAC 6-4]
C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-6.1-5(a)(2)]
C.7 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]
C.8 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]
C.9 Compliance Monitoring [326 IAC 2-1.1-11]
C.10 Instrument Specifications [326 IAC 2-1.1-11]

Corrective Actions and Response Steps
C.11 Response to Excursions or Exceedances
C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]
C.13 Malfunctions Report [326 IAC 1-6-2]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]
C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

D.1. EMISSIONS UNIT OPERATION CONDITIONS 18

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]
D.1.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1]
D.1.2 PSD Minor Limitations [326 IAC 2-2]
D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements
D.1.4 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]
D.1.5 Visible Emissions Notations
D.1.6 Parametric Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]
D.1.7 Record Keeping Requirements
D.1.8 Reporting Requirements

Annual Notification 24
Malfunction Report 25
MSOP Quarterly Report Form 27

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary country grain elevator that handles grain and bulk material, including corn byproducts and soybean byproducts.

Source Address:	2350 Broadway Avenue, Evansville, Indiana 47712
General Source Phone Number:	217-412-5631
SIC Code:	5153 (Grain and Field Beans) and 4491 (Marine Cargo Handling)
County Location:	Vanderburgh
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) Two (2) truck receiving pits, identified as Pit # 1 and # 2, constructed in 1988 and 1949, respectively, each with a maximum receiving throughput of 600 tons per hour (20,000 bushels per hour at 60 pounds per bushel), exhausting to baghouse # 2 for particulate control.

(b) One (1) truck receiving pit, identified as Pit # 3, constructed in 1949, with a maximum receiving throughput of 360 tons per hour (12,000 bushels per hour at 60 pounds per bushel), exhausting to baghouse # 2 for particulate control.

(c) One (1) rail receiving pit, identified as EP-05A, constructed in 1990, with a maximum receiving throughput of 660 tons per hour (22,000 bushels per hour at 60 pounds per bushel).

Note: Approximately 100,000 tons per year of bulk materials including corn byproducts and soybean byproducts are received by truck or railcar and dumped into one of the truck receiving pits or the rail receiving pit. These products then proceed directly to barge load-out.

(d) One (1) enclosed internal grain handling operation, constructed between 1949 and 2001, consisting of the following equipment, and using baghouses (#1 and #2) and exhausting to stacks (#1 and #2) for particulate control:

(1) Seven (7) bucket elevators associated with fully enclosed conveyor belts, identified as EP-08, with a maximum throughput of 720 tons per hour (24,000 bushels per hour at 60 pounds per bushel), associated with fully enclosed conveyor belts.

(e) One (1) enclosed grain cleaner, identified as EP-07, constructed in 1989, with a

maximum throughput of 300 tons of grain per hour (10,000 bushels per hour at 60 pounds per bushel), equipped with enclosures for particulate control.

(f) One (1) natural gas column grain dryer, identified as EP-06, constructed in 1996, with a 31.6 MMBtu/hour burner, with a maximum throughput of 90 tons of grain per hour (3,000 bushels per hour at 60 pounds per bushel), equipped with a perforation plate for particulate control.

(g) Two (2) truck load-out areas, identified as EP-03, constructed in 1949, with a maximum throughput of 300 tons per hour (10,000 bushels of grain per hour at 60 pounds per bushel), and exhausting to baghouse # 2 for particulate control.

(h) Four (4) truck load-out spouts, identified as EP-3A, EP-3B, EP-3C, and EP-3D, approved for construction in 2009, each with a maximum throughput of 499.2 tons per hour (16,640 bushels of grain per hour at 60 pounds per bushel), using attached sleeves for particulate control.

(i) One (1) rail load-out, identified as EP-05, constructed in 1990, with a maximum throughput of 660 tons per hour (22,000 bushels of grain per hour at 60 pounds per bushel), exhausting to baghouse # 1 for particulate control.

(j) One (1) barge load-out, identified as EP-04, constructed in 1979, with a maximum throughput of 1080 tons per hour (36,000 bushels of grain per hour at 60 pounds per bushel), exhausting to baghouse # 1 for particulate control and a 14,500 cubic foot per minute (CFM) booster fan, installed in 2009, attached to the existing dust collection system near the midpoint of the barge load out bridge tower for improved dust collection.

(k) Three (3) storage bins, identified as bins #2, #3, and #4, each with a maximum capacity of 450.54 tons (15,018 bushels of grain at 60 pounds per bushel).

(l) Two (2) storage bins, identified as bins #5 and #10, each with a maximum capacity of 112.17 tons (3,739 bushels of grain at 60 pounds per bushel).

(m) Four (4) storage bins, identified as bins #6, #7, #8, and #9, each with a maximum capacity of 136.23 tons (4,541 bushels of grain at 60 pounds per bushel).

(n) Two (2) storage bins, identified as bins #11 and #12, each with a maximum capacity of 57.3 tons (1,910 bushels of grain at 60 pounds per bushel).

(o) One (1) storage bin, identified as bin #13, with a maximum capacity of 82.5 tons (2,750 bushels of grain at 60 pounds per bushel).

(p) Ten (10) storage bins, identified as bins #100, #101, #102, #103, #104, #300, #301, #302, #303, and #304, each with a maximum capacity of 499.02 tons (16,634 bushels of grain at 60 pounds per bushel).

(q) Two (2) storage bins, identified as bins #200 and #205, each with a maximum capacity of 154.08 tons (5,136 bushels of grain at 60 pounds per bushel).

(r) Four (4) storage bins, identified as bins #201, #202, #203, and #204, each with a maximum capacity of 392.55 tons (13,085 bushels of grain at 60 pounds per bushel).

(s) One (1) storage bin, identified as bin #500, with a maximum capacity of 641.49 tons (21,383 bushels of grain at 60 pounds per bushel).

(t) Two (2) storage bins, identified as bins #501 and #701, each with a maximum capacity of

650.25 tons (21,675 bushels of grain at 60 pounds per bushel).

(u) Eight (8) storage bins, identified as bins # 502, #503, #504, #505, #702, #703, #704, and #705, each with a maximum capacity of 659.79 tons (21,993 bushels of grain at 60 pounds per bushel).

(v) Three (3) storage bins, identified as bins #600, #601, and #602, each with a maximum capacity of 429.69 tons (14,323 bushels of grain at 60 pounds per bushel).

(w) Two (2) storage bins, identified as bins #603 and #604, each with a maximum capacity of 434.76 tons (14,492 bushels of grain at 60 pounds per bushel).

(x) One (1) storage bin, identified as bin #605, with a maximum capacity of 202.35 tons (6,745 bushels of grain at 60 pounds per bushel).

(y) One (1) storage bin, identified as bin #700, with a maximum capacity of 658.2 tons (21,940 bushels of grain at 60 pounds per bushel).

(z) Two (2) storage bins, identified as bins #801 and #802, each with a maximum capacity of 4380 tons (146,000 bushels of grain at 60 pounds per bushel).

(aa) One (1) storage bin, identified as bin #1 that is used to weigh product only.

(bb) Paved roads, identified as EP-09. [326 IAC 6-4]

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M163-31595-00042, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

(a) All terms and conditions of permits established prior to M163-31595-00042 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

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

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Permit Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this permit.

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

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

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

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

C.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 thirty percent (30%) 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).

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

C.7 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

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

C.10 Instrument Specifications [326 IAC 2-1.1-11]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.11 Response to Excursions or Exceedances

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

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

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

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

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

C.13 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

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

(c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Two (2) truck receiving pits, identified as Pit # 1 and # 2, constructed in 1988 and 1949, respectively, each with a maximum receiving throughput of 600 tons per hour (20,000 bushels per hour at 60 pounds per bushel), exhausting to baghouse # 2 for particulate control.

(b) One (1) truck receiving pit, identified as Pit # 3, constructed in 1949, with a maximum receiving throughput of 360 tons per hour (12,000 bushels per hour at 60 pounds per bushel), exhausting to baghouse # 2 for particulate control.

(c) One (1) rail receiving pit, identified as EP-05A, constructed in 1990, with a maximum receiving throughput of 660 tons per hour (22,000 bushels per hour at 60 pounds per bushel).

Note: Approximately 100,000 tons per year of bulk materials including corn byproducts and soybean byproducts are received by truck or railcar and dumped into one of the truck receiving pits or the rail receiving pit. These products then proceed directly to barge load-out.

(d) One (1) enclosed internal grain handling operation, constructed between 1949 and 2001, consisting of the following equipment, and using baghouses (#1 and #2) and exhausting to stacks (#1 and #2) for particulate control:

(1) Seven (7) bucket elevators associated with fully enclosed conveyor belts, identified as EP-08, with a maximum throughput of 720 tons per hour (24,000 bushels per hour at 60 pounds per bushel), associated with fully enclosed conveyor belts.

(e) One (1) enclosed grain cleaner, identified as EP-07, constructed in 1989, with a maximum throughput of 300 tons of grain per hour (10,000 bushels per hour at 60 pounds per bushel), equipped with enclosures for particulate control.

(f) One (1) natural gas column grain dryer, identified as EP-06, constructed in 1996, with a 31.6 MMBtu/hour burner, with a maximum throughput of 90 tons of grain per hour (3,000 bushels per hour at 60 pounds per bushel), equipped with a perforation plate for particulate control.

(g) Two (2) truck load-out areas, identified as EP-03, constructed in 1949, with a maximum throughput of 300 tons per hour (10,000 bushels of grain per hour at 60 pounds per bushel), and exhausting to baghouse # 2 for particulate control.

(h) Four (4) truck load-out spouts, identified as EP-3A, EP-3B, EP-3C, and EP-3D, approved for construction in 2009, each with a maximum throughput of 499.2 tons per hour (16,640 bushels of grain per hour at 60 pounds per bushel), using attached sleeves for particulate control.

(i) One (1) rail load-out, identified as EP-05, constructed in 1990, with a maximum throughput of 660 tons per hour (22,000 bushels of grain per hour at 60 pounds per bushel), exhausting to baghouse # 1 for particulate control.

(j) One (1) barge load-out, identified as EP-04, constructed in 1979, with a maximum throughput of 1080 tons per hour (36,000 bushels of grain per hour at 60 pounds per bushel), exhausting to baghouse # 1 for particulate control and a 14,500 cubic foot per minute (CFM) booster fan, installed in 2009, attached to the existing dust collection system near the midpoint of the barge load out bridge tower for improved dust collection.

(k) Three (3) storage bins, identified as bins #2, #3, and #4, each with a maximum capacity of 450.54 tons (15,018 bushels of grain at 60 pounds per bushel).

(l) Two (2) storage bins, identified as bins #5 and #10, each with a maximum capacity of 112.17 tons (3,739 bushels of grain at 60 pounds per bushel).

(m) Four (4) storage bins, identified as bins #6, #7, #8, and #9, each with a maximum capacity of 136.23 tons (4,541 bushels of grain at 60 pounds per bushel).

(n) Two (2) storage bins, identified as bins #11 and #12, each with a maximum capacity of 57.3 tons (1,910 bushels of grain at 60 pounds per bushel).

(o) One (1) storage bin, identified as bin #13, with a maximum capacity of 82.5 tons (2,750 bushels of grain at 60 pounds per bushel).

(p) Ten (10) storage bins, identified as bins #100, #101, #102, #103, #104, #300, #301, #302, #303, and #304, each with a maximum capacity of 499.02 tons (16,634 bushels of grain at 60 pounds per bushel).

(q) Two (2) storage bins, identified as bins #200 and #205, each with a maximum capacity of 154.08 tons (5,136 bushels of grain at 60 pounds per bushel).

(r) Four (4) storage bins, identified as bins #201, #202, #203, and #204, each with a maximum capacity of 392.55 tons (13,085 bushels of grain at 60 pounds per bushel).

(s) One (1) storage bin, identified as bin #500, with a maximum capacity of 641.49 tons (21,383 bushels of grain at 60 pounds per bushel).

(t) Two (2) storage bins, identified as bins #501 and #701, each with a maximum capacity of 650.25 tons (21,675 bushels of grain at 60 pounds per bushel).

(u) Eight (8) storage bins, identified as bins # 502, #503, #504, #505, #702, #703, #704, and #705, each with a maximum capacity of 659.79 tons (21,993 bushels of grain at 60 pounds per bushel).

(v) Three (3) storage bins, identified as bins #600, #601, and #602, each with a maximum capacity of 429.69 tons (14,323 bushels of grain at 60 pounds per bushel).

(w) Two (2) storage bins, identified as bins #603 and #604, each with a maximum capacity of 434.76 tons (14,492 bushels of grain at 60 pounds per bushel).

(x) One (1) storage bin, identified as bin #605, with a maximum capacity of 202.35 tons (6,745 bushels of grain at 60 pounds per bushel).

(y) One (1) storage bin, identified as bin #700, with a maximum capacity of 658.2 tons (21,940 bushels of grain at 60 pounds per bushel).

(z) Two (2) storage bins, identified as bins #801 and #802, each with a maximum capacity of 4380 tons (146,000 bushels of grain at 60 pounds per bushel).

(aa) One (1) storage bin, identified as bin #1 that is used to weigh product only.

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

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

D.1.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1]

(a) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the facilities listed below shall be limited to 0.03 grains per dry standard cubic foot (grains/dscf).

Emission Unit	Control Description	Particulate Emission Limit (grains/dscf)
Three (3) Truck Receiving Pits (Pit #1, Pit #2 & Pit #3)	baghouse #2	0.03
Rail Receiving Pit (EP-05A)	none	0.03
One (1) grain dryer	perforation plate	0.03
One (1) grain cleaner	enclosed	0.03
Seven (7) bucket elevators	baghouse #1 and #2	0.03
Fifty (50) storage bins	enclosed	0.03
Two (2) truck load-out areas	baghouse #2	0.03
Four (4) truck load-out spouts	sleeves	0.03
One (1) rail load-out area	baghouse #1	0.03
One (1) barge load-out area	baghouse #1	0.03

(b) Pursuant to 326 IAC 6.5-1-2(d)(2) (Particulate Matter Limitations Except Lake County), the Permittee shall comply with the following for operations associated with the grain elevator:

The Permittee shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

(1) Housekeeping practices shall be conducted as follows:

(A) Areas to be swept and maintained shall include, at a minimum, the following:

(i) General grounds, yard, and other open areas.

(ii) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.

(iii) Grain driers with respect to accumulated particulate matter.

(B) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.

(C) Dust from driveways, access roads, and other areas of travel shall be controlled.

(D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:

(A) Malfunctions.
(B) Breakdowns.
(C) Improper adjustment.
(D) Operating above the rated or designed capacity.
(E) Not following designed operating specifications.
(F) Lack of good preventive maintenance care.
(G) Lack of critical and proper spare replacement parts on hand.
(H) Lack of properly trained and experienced personnel.

(3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

D.1.2 PSD Minor Limitations [326 IAC 2-2]

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

(a) The total amount of grain byproducts and soybean byproducts received at Truck Receiving Pits #1, #2 and #3 and Rail Receiving Pit EP-05A shall be less than 200,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and

(b) PM emissions before control shall not exceed the following emission limitations:

Unit Description	PM Emission Limit (lbs/ton)
Truck Receiving Pits #1, #2 and #3	0.18
Rail Receiving Pit EP-05A	0.032
Internal Handling and Grain Cleaning Operations	0.061
Load out - Barge	0.016

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

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.4 Particulate Control

(a) In order to comply with Condition D.1.1, the enclosures and baghouses associated with the emission units in Condition D.1.1 shall be in operation and control particulate emissions from the respective emission units at all times the emission units 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.

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

D.1.5 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse (#1 and #2) stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable a response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the pressure drop across baghouses # 1 and # 2 used in conjunction with the truck receiving facilities, rail load-out, truck load-out, barge load-out, and internal handling operations, at least once per day when the grain handling processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take reasonable response. The normal range for this unit is a pressure drop between 0.5 and 4.5 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. 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.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

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

D.1.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.2(a), the Permittee shall maintain records of the total grain byproducts and soybean byproducts received at the Truck Receiving Pits # 1, #2 and # 3 and Rail Receiving Pit EP-05A each month and each compliance period.

(b) To document the compliance status with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the stack exhausts from baghouse #1 and baghouse #2. 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).

(c) To document the compliance status with Condition D.1.6, the Permittee shall maintain once per day records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

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

D.1.8 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.2(a) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	ADM Grain Company
Address:	2350 Broadway Avenue
City:	Evansville, Indiana 47712
Phone #:	217-412-5631
MSOP #:	M163-31595-00042

I hereby certify that ADM Grain Company is :
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that ADM Grain Company is :
- ☐ in compliance with the requirements of MSOP M163-31595-00042.
- ☐ not in compliance with the requirements of MSOP M163-31595-00042.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

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

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

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

MSOP Quarterly Report

Source Name: ADM Grain Company
Source Address: 2350 Broadway Avenue, Evansville, Indiana 47712
FESOP Permit No.: M163-31595-00042
Facility: Truck Receiving Pits #1, #2 and #3
Parameter: Grain byproducts and soybean byproducts received
Limit: The total amount of grain byproducts and soybean byproducts received at Truck Receiving Pits #1, #2 and #3 shall be less than 200,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER:_____ YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by:_____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Minor Source Operating Permit (MSOP) Renewal

Source Background and Description

Source Name:	**ADM Grain Company**
Source Location:	**2350 Broadway Avenue Evansville IN 47712**
County:	**Vanderburgh**
SIC Code:	**5153 (Grain and Field Beans) and 4491 (Marine Cargo Handling)**
Permit Renewal No.:	**M163-31595-00042**
Permit Reviewer:	**Susann Brown**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from ADM Grain Company (Evansville Elevator) relating to the continued operation of a stationary country grain elevator that handles grain and bulk material, including corn byproducts and soybean byproducts. This facility receives corn, soybeans, and wheat, which is stored in bins and subsequently shipped by rail, barge or truck. There is no processing of these grains at this facility. The bulk material, including corn byproducts and soybean byproducts, is received by truck or rail and shipped by barge. There is no storage of bulk materials at this facility. On March 9, 2012, ADM Grain Company submitted an application to the OAQ requesting to renew its operating permit. This is the first renewal of the operating permit for ADM Grain Company (Evansville Elevator).

Permitted Emission Units and Pollution Control Equipment

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

(a) Two (2) truck receiving pits, identified as Pit # 1 and # 2, constructed in 1988 and 1949, respectively, each with a maximum receiving throughput of 600 tons per hour (20,000 bushels per hour at 60 pounds per bushel), exhausting to baghouse # 2 for particulate control.

(b) One (1) truck receiving pit, identified as Pit # 3, constructed in 1949, with a maximum receiving throughput of 360 tons per hour (12,000 bushels per hour at 60 pounds per bushel), exhausting to baghouse # 2 for particulate control.

(c) One (1) rail receiving pit, identified as EP-05A, constructed in 1990, with a maximum receiving throughput of 660 tons per hour (22,000 bushels per hour at 60 pounds per bushel).

Note: Approximately 100,000 tons per year of bulk materials including corn byproducts and soybean products are received by truck or railcar and dumped into one of the truck receiving pits or the rail receiving pit. These products then proceed directly to barge loadout.

(d) One (1) enclosed internal grain handling operation, constructed between 1949 and 2001, consisting of the following equipment, and using baghouses (# 1 and # 2) and exhausting to stacks (#1 and #2) for particulate control:

(1) Seven (7) bucket elevators associated with fully enclosed conveyor belts, identified as EP-08, with a maximum throughput of 720 tons per hour (24,000 bushels per hour at 60 pounds per bushel), associated with fully enclosed conveyor belts.

(e) One (1) enclosed grain cleaner, identified as EP-07, constructed in 1989, with a maximum throughput of 300 tons of grain per hour (10,000 bushels per hour at 60 pounds per bushel), equipped with enclosures for particulate control.

(f) One (1) natural gas column grain dryer, identified as EP-06, constructed in 1996, with a 31.6 MMBtu/hour burner, with a maximum throughput of 90 tons of grain per hour (3,000 bushels per hour at 60 pounds per bushel), equipped with a perforation plate for particulate control.

(g) Two (2) truck load-out areas, identified as EP-03, constructed in 1949, with a maximum throughput of 300 tons per hour (10,000 bushels of grain per hour at 60 pounds per bushel), and exhausting to baghouse # 2 for particulate control.

(h) Four (4) truck load-out spouts, identified as EP-3A, EP-3B, EP-3C, and EP-3D, approved for construction in 2009, each with a maximum throughput of 499.2 tons per hour (16,640 bushels of grain per hour at 60 pounds per bushel), using attached sleeves for particulate control.

(i) One (1) rail load-out, identified as EP-05, constructed in 1990, with a maximum throughput of 660 tons per hour (22,000 bushels of grain per hour at 60 pounds per bushel), exhausting to baghouse # 1 for particulate control.

(j) One (1) barge load-out, identified as EP-04, constructed in 1979, with a maximum throughput of 1080 tons per hour (36,000 bushels of grain per hour at 60 pounds per bushel), exhausting to baghouse # 1 for particulate control and a 14,500 cubic foot per minute (CFM) booster fan, installed in 2009, attached to the existing dust collection system near the midpoint of the barge load out bridge tower for improved dust collection.

(k) Three (3) storage bins, identified as bins #2, #3, and #4, each with a maximum capacity of 450.54 tons (15,018 bushels of grain at 60 pounds per bushel).

(l) Two (2) storage bins, identified as bins #5 and #10, each with a maximum capacity of 112.17 tons (3,739 bushels of grain at 60 pounds per bushel).

(m) Four (4) storage bins, identified as bins #6, #7, #8, and #9, each with a maximum capacity of 136.23 tons (4,541 bushels of grain at 60 pounds per bushel).

(n) Two (2) storage bins, identified as bins #11 and #12, each with a maximum capacity of 57.3 tons (1,910 bushels of grain at 60 pounds per bushel).

(o) One (1) storage bin, identified as bin #13, with a maximum capacity of 82.5 tons (2,750 bushels of grain at 60 pounds per bushel).

(p) Ten (10) storage bins, identified as bins #100, #101, #102, #103, #104, #300, #301, #302, #303, and #304, each with a maximum capacity of 499.02 tons (16,634 bushels of grain at 60 pounds per bushel).

(q) Two (2) storage bins, identified as bins #200 and #205, each with a maximum capacity of 154.08 tons (5,136 bushels of grain at 60 pounds per bushel).

(r) Four (4) storage bins, identified as bins #201, #202, #203, and #204, each with a maximum capacity of 392.55 tons (13,085 bushels of grain at 60 pounds per bushel).

(s) One (1) storage bin, identified as bin #500, with a maximum capacity of 641.49 tons (21,383 bushels of grain at 60 pounds per bushel).

(t) Two (2) storage bins, identified as bins #501 and #701, each with a maximum capacity of 650.25 tons (21,675 bushels of grain at 60 pounds per bushel).

(u) Eight (8) storage bins, identified as bins # 502, #503, #504, #505, #702, #703, #704, and #705, each with a maximum capacity of 659.79 tons (21,993 bushels of grain at 60 pounds per bushel).

(v) Three (3) storage bins, identified as bins #600, #601, and #602, each with a maximum capacity of 429.69 tons (14,323 bushels of grain at 60 pounds per bushel).

(w) Two (2) storage bins, identified as bins #603 and #604, each with a maximum capacity of 434.76 tons (14,492 bushels of grain at 60 pounds per bushel).

(x) One (1) storage bin, identified as bin #605, with a maximum capacity of 202.35 tons (6,745 bushels of grain at 60 pounds per bushel).

(y) One (1) storage bin, identified as bin #700, with a maximum capacity of 658.2 tons (21,940 bushels of grain at 60 pounds per bushel).

(z) Two (2) storage bins, identified as bins #801 and #802, each with a maximum capacity of 4380 tons (146,000 bushels of grain at 60 pounds per bushel).

(aa) One (1) storage bin, identified as bin #1 that is used to weigh product only.

(bb) Paved roads, identified as EP-09. [326 IAC 6-4]

Existing Approvals

Since the issuance of the MSOP M163-20504-00042 on December 17, 2007, the source has constructed or has been operating under the following additional approvals:

(a) MSOP Notice Only Change No. 163-27136-00042, issued on December 11, 2008;

(b) MSOP Notice Only Change No. 163-27399-00042, issued on February 2, 2009;

(c) MSOP Minor Permit Revision No. 163-28381-00042, issued on October 2, 2009; and

(d) MSOP Notice Only Change No. 163-28688-00042, issued on December 21, 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 Vanderburgh County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.
Unclassifiable or attainment effective October 27, 2011, for PM2.5.

(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. Vanderburgh 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) $PM_{2.5}$
Vanderburgh 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 SO_2 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
Vanderburgh County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

(a) 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, therefore fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Note: Although the New Source Performance Standard (NSPS) for Grain Elevators (40 CFR 60, Subpart DD) was promulgated on or before August 7, 1980, this facility does not fall within the "listed source category" for Subpart DD, since this grain elevator does not have a permanent storage capacity of more than 2.5 million bushels. The permanent storage capacity of this source is 0.94 million U.S. bushels.

(b) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions (including fugitive and non-fugitive emissions) of the source.

Pollutant	Potential to Emit (tons/year)*
PM	266.35
PM10**	96.43
PM2.5	17.35
SO2	0.08
NOx	13.57
VOC	0.75
CO	11.40
GHGs as CO2e	16382
Worst Single HAP	0.24 (hexane)
Total HAPs	0.26

* Fugitive emissions are not counted toward the determination of PSD applicability.
** Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM (including fugitive and non-fugitive emissions) is greater than one hundred (100) tons per year. However, since this type of operation is not one of the twenty-eight (28) listed source categories under 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 Part 70 Permit applicability. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) Renewal will be issued.

(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 CO_2 equivalent emissions (CO_2e) 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/or 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 will be issued an MSOP Renewal.

Potential to Emit of the Entire Source After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Non-Fugitive Emissions* **										
Grain Elevator (grain receiving, handling, storage, and shipping)	223.14	76.60	13.04	—	—	—	—	—	—	—
Byproducts (grain byproducts and soybean byproducts receiving, handling, and shipping)	25.70	12.20	2.07	—	—	—	—	—	—	—
Natural Gas Dryer	0.26	1.03	1.03	0.08	13.57	0.75	11.40	16382	0.26	0.24 (hexane)
Total PTE (Non-Fugitive Emissions)* **	**249.10**	**89.83**	**16.14**	**0.08**	**13.57**	**0.75**	**11.40**	**16382**	**0.26**	**0.24 (hexane)**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO_2e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO_2e	NA	NA
Fugitive Emissions* **										
Paved Roads***	5.81	1.16	0.29	—	—	—	—	—	—	—
Total PTE (Fugitive Emissions)* **	**5.81**	**1.16**	**0.29**	—	—	—	—	—	—	—
Total PTE of Entire Source (Non-Fugitive and Fugitive)* **	**254.91**	**90.99**	**16.43**	**0.08**	**13.57**	**0.75**	**11.40**	**16382**	**0.26**	**0.24 (hexane)**

*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 $PM_{2.5}$.
***Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 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 and Part 70 Permit applicability.

(a) PSD Minor Source
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM is limited to less than 250 tons per year, the potential to emit all other attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

(a) The total amount of grain byproducts and soybean byproducts received at Truck Receiving Pits #1, #2 and #3 and Rail Receiving Pit EP-05A shall be less than 200,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

(b) PM emissions before control shall not exceed the following emission limitations:

Unit Description	PM Emission Limit (lbs/ton)
Truck Receiving Pits #1, #2 and #3	0.18
Rail Receiving Pit EP-05A	0.032
Internal Handling and Grain Cleaning Operations	0.061
Load out - Barge	0.016

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

Note: The above throughput and PM limitations are intended to limit the PM emissions before control and do not take into account PM control provided by the baghouses (#1 and #2), or the sleeves or enclosures on the internal handling equipment.

Federal Rule Applicability

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD (326 IAC 12), are not included in this permit because the source has a permanent storage capacity less than 2.5 million U.S. bushels. The permanent storage capacity of the source is 939,533 U.S. bushels.

Note: Pursuant to NSPS Subpart DD, 40 CFR 60.301 (Definitions), "permanent storage capacity" means grain storage capacity which is inside a building, bin, or silo. As indicated in a memorandum (dated November 21, 2007) from Michael S. Alushin, Director, Compliance Assessment and Media Programs Division, Office of Compliance, United States Environmental Protection Agency (USEPA), to Kendall Keith, President, National Grain and Feed Association, a storage system may be considered as a "bin" under NSPS Subpart DD and included as part of the "permanent storage capacity" of the grain elevator if the storage system is designed with permanent structural features such as asphalt or concrete foundations, rigid sidewalls, long-lasting tarp covers, and permanent conveyor systems.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(c) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart

DDDDD (63.7480 through 63.7575) (326 IAC 20-95) are not included in the permit renewal, because this source is not a major source of HAPs.

(d) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (63. 11193 through 63.11237), are not included in the permit renewal, because the source does not contain boilers. This source has a natural gas fired grain dryer.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDD are not included in the permit, since this source is not considered a prepared feeds manufacturing facility as defined by 40 CFR 63.11627. This source does not manufacture animal feed. This source consists of a country grain elevator and a bulk material loading/unloading operation.

(f) 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.

(g) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

326 IAC 2-3 (Emission Offset)

This source is not located in a nonattainment county. Therefore, 326 IAC 2-3 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Vanderburgh County, is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and does not emit lead in the ambient air at levels equal to or greater than five (5) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of thirty percent (30%) 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), 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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5-1(a) and 326 IAC 6-5-1(a)(2)(E), this source is not subject to the requirements of 326 IAC 6-5, it does not have potential fugitive particulate emissions greater than 25 tons per year and it is located in the City of Evansville (Vanderburgh County).

326 IAC 6.8 (PM Limitations for Lake County)

This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD

State Rule Applicability – Individual Facilities

Grain Elevator

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a) and 326 IAC 6.5-1-2(a), this source is subject to the requirements of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), because this source is located in Vanderburgh County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year.

(a) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the facilities listed below shall be limited to 0.03 grains per dry standard cubic foot (grains/dscf).

Emission Unit	Control Description	Particulate Emission Limit (grains/dscf)
Three (3) Truck Receiving Pits (Pit #1, Pit #2 & Pit #3)	baghouse # 2	0.03
Rail Receiving Pit (EP-05A)	none	0.03
One (1) grain dryer	perforation plate	0.03
One (1) grain cleaner	enclosed	0.03
Seven (7) bucket elevators	baghouse # 1 and # 2	0.03
Fifty (50) storage bins	enclosed	0.03
Two (2) truck load-out areas	baghouse # 2	0.03
Four (4) truck load-out spouts	sleeves	0.03
One (1) rail load-out area	baghouse # 1	0.03
One (1) barge load-out area	baghouse # 1	0.03

(b) Pursuant to 326 IAC 6.5-1-2(d)(2) (Particulate Matter Limitations Except Lake County), the Permittee shall comply with the following for operations associated with the grain elevator:

The Permittee shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

(1) Housekeeping practices shall be conducted as follows:

(A) Areas to be swept and maintained shall include, at a minimum, the following:

(i) General grounds, yard, and other open areas.

(ii) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.

(iii) Grain driers with respect to accumulated particulate matter.

(B) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.

(C) Dust from driveways, access roads, and other areas of travel shall be controlled.

(D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:

(A) Malfunctions.
(B) Breakdowns.
(C) Improper adjustment.
(D) Operating above the rated or designed capacity.
(E) Not following designed operating specifications.
(F) Lack of good preventive maintenance care.
(G) Lack of critical and proper spare replacement parts on hand.
(H) Lack of properly trained and experienced personnel.

(3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

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

Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if a particulate limitation established in 326 IAC 6.5 is more stringent than the particulate limitation established in 326 IAC 6-3-2. Since the particulate limitations established by 326 IAC 6.5-1-2 for each facility are more stringent than the particulate limitations that would be established by 326 IAC 6-3-2, the source is not subject to the requirements of 326 IAC 6-3-2.

<u>Bulk Products Operations</u>

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a) and 326 IAC 6.5-1-2(a), this source is subject to the requirements of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), because this source is located in Vanderburgh County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year.

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the bulk products receiving, transfer, and shipping operations shall be limited to 0.03 grains per dry standard cubic foot (grains/dscf).

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

Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if a particulate limitation established in 326 IAC 6.5 is more stringent than the particulate limitation established in 326 IAC 6-3-2. Since the particulate limitations established by 326 IAC 6.5-1-2 for each facility are more stringent than the particulate limitations that would be established by 326 IAC 6-3-2, the source is not subject to the requirements of 326 IAC 6-3-2.

Natural Gas-Fired Dryer (natural gas combustion)

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

The natural gas-fired grain dryer is not subject to the requirements of 326 IAC 6-2, because it is not an indirect heating unit.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the natural gas-fired grain dryer is not subject to the requirements of 326 IAC 7-1.1, since it has unlimited sulfur dioxide (SO_2) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The natural gas-fired grain dryer is not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

Compliance Determination and Monitoring Requirements

(a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Units	Control	Parameter	Frequency	Range	Excursions and Exceedances
Truck Receiving Pits #1, #2 and #3	baghouse # 2	Water Pressure Drop	Daily	0.5 to 4.5 inches of water	Response Steps
		Visible Emissions		Normal-Abnormal	
Truck/Rail Load-out and Barge Load-out	baghouse # 1 and # 2	Water Pressure Drop	Daily	0.5 to 4.5 inches of water	Response Steps

These monitoring conditions are necessary because baghouses #1 and #2 must operate properly to ensure compliance with 326 IAC 6.5-1-2.

(b) There are no testing requirements applicable to this source:

Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved.

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 March 9, 2012.

Conclusion

The operation of this stationary country grain elevator shall be subject to the conditions of the attached MSOP Renewal No. M163-31595-00042.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Susann Brown at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5176 or toll free at 1-800-451-6027 extension 45176.

(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

TSD Appendix A: Emissions Calculations

Company Name: ADM Grain Company
Source Address: 2350 Broadway Ave Evansville, IN 47712
Permit Number: M163-31595-00042
Reviewer: Susann Brown

	Unlimited/Uncontrolled Potential to Emit (tons/year)*										
Process description	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Non-Fugitive Emissions**											
Grain Elevator (grain receiving, handling, storage and shipping)	223.14	76.60	13.04	-	-	-	-	-	-	-	-
Byproducts (grain byproducts and soybean byproducts receiving, handling, and shipping)	37.15	17.63	2.99	-	-	-	-	-	-	-	-
Natural Gas Dryer	0.26	1.03	1.03	0.08	13.57	0.75	11.40	16382	0.26	0.24	(hexane)
Total Non-Fugitive Emissions**	**260.55**	**95.27**	**17.07**	**0.08**	**13.57**	**0.75**	**11.40**	**16382**	**0.26**	**0.24**	**(hexane)**
Fugitive Emissions**											
Paved Roads***	5.81	1.16	0.29	-	-	-	-	-	-	-	-
Total Fugitive Emissions**	**5.81**	**1.16**	**0.29**	-	-	-	-	-	-	-	**-**
Total Non-Fugitive and Fugitive Emissions**	**266.35**	**96.43**	**17.35**	**0.08**	**13.57**	**0.75**	**11.40**	**16382**	**0.26**	**0.24**	**(hexane)**

	Limited/Uncontrolled Potential to Emit (tons/year)*										
Process description	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Non-Fugitive Emissions**											
Grain Elevator (grain receiving, handling, storage and shipping)	223.14	76.60	13.04	-	-	-	-	-	-	-	-
Byproducts (grain byproducts and soybean byproducts receiving, handling, and shipping)	25.70	12.20	2.07	-	-	-	-	-	-	-	-
Natural Gas Dryer	0.26	1.03	1.03	0.08	13.57	0.75	11.40	16382	0.26	0.24	(hexane)
Total Non-Fugitive Emissions**	**249.10**	**89.83**	**16.14**	**0.08**	**13.57**	**0.75**	**11.40**	**16382**	**0.26**	**0.24**	**(hexane)**
Fugitive Emissions**											
Paved Roads***	5.81	1.16	0.29	-	-	-	-	-	-	-	-
Total Fugitive Emissions**	**5.81**	**1.16**	**0.29**	-	-	-	-	-	-	-	**-**
Total Non-Fugitive and Fugitive Emissions**	**254.91**	**90.99**	**16.43**	**0.08**	**13.57**	**0.75**	**11.40**	**16382**	**0.26**	**0.24**	**(hexane)**

	Limited/Controlled Potential to Emit (tons/year)*										
Process description	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Non-Fugitive Emissions**											
Grain Elevator (grain receiving, handling, storage and shipping)	38.04	11.29	1.91	-	-	-	-	-	-	-	-
Byproducts (grain byproducts and soybean byproducts receiving, handling, and shipping)	2.57	1.22	0.21	-	-	-	-	-	-	-	-
Natural Gas Dryer	0.26	1.03	1.03	0.08	13.57	0.75	11.40	16382.39	0.26	0.24	(hexane)
Total Non-Fugitive Emissions**	**40.86**	**13.54**	**3.15**	**0.08**	**13.57**	**0.75**	**11.40**	**16382**	**0.26**	**0.24**	**(hexane)**
Fugitive Emissions**											
Paved Roads***	5.81	1.16	0.29	-	-	-	-	-	-	-	-
Total Fugitive Emissions**	**5.81**	**1.16**	**0.29**	-	-	-	-	-	-	-	**-**
Total Non-Fugitive and Fugitive Emissions**	**46.67**	**14.70**	**3.44**	**0.08**	**13.57**	**0.75**	**11.40**	**16382**	**0.26**	**0.24**	**(hexane)**

Notes

*Potential to Emit (PTE) is based on rated capacity at 8,760 hours/year.

**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. The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

***Mitigated PTE (tons/yr) is taking natural mitigation due to precipitation into consideration.

TSD Appendix A: Emissions Calculations
PM/PM10/PM2.5 Emissions From the Grain Handling, Storage and Drying Processes

Company Name: ADM Grain Company
Source Address: 2350 Broadway Avenue, Evansville, IN 47712
Permit Number: M163-31595-00042
Reviewer: Susann Brown

Bulk Density of Grain = 60 lbs/bushel

1. Potential Annual Throughput Calculation

	(bushels/yr)	(tons/yr)
Annual Maximum Throughput	19,584,071	587,522
Potential Annual Throughput	23,500,885	705,027

1 To calculate the annual maximum throughput (bushels/yr), calculate the amount of grain received by the facility each of the last five years and use the largest of these numbers (this data is from Permit M163-20504-00042 issued 12/17/2007).
2 To calculate the largest potential annual throughput (bushels/yr), multiply the annual maximum throughput (bushels/yr) by 1.2.
3 To calculate tons/yr, multiply bushels/yr by 60 (pounds per bushel of corn) and divide by 2000 (pounds per ton).

Total number of internal handling steps = 2
Potential Internal Handling Throughput = 1,410,053 tons/year

2. PTE Calculations

		Uncontrolled Emission Factors (lbs/ton)					PTE Before Control (tons/yr)			PTE After Control (tons/yr)		
Emissions Unit Description	Maximum Grain Throughput (tons/yr)	PM	PM10	PM2.5	Control Device(s)	Collection and Control Efficiency (%)	PM	PM10	PM2.5	PM	PM10	PM2.5
Receiving - Straight Truck	705,027	0.18	0.059	0.010	baghouse #2	90%	63.45	20.80	3.53	6.35	2.08	0.35
Receiving - Railcar	705,027	0.032	0.0078	0.001	none	0%	11.28	2.75	0.46	11.28	2.75	0.46
					Receiving (worst case assumption)		**63.45**	**20.80**	**3.53**	**11.28**	**2.75**	**0.46**
Internal Handling and Grain Cleaning*	1,410,053	0.061	0.034	0.0058	enclosed and baghouse #1 and baghouse #2	90%	43.01	23.97	4.09	4.30	2.40	0.41
Drying - Column Dryer	705,027	0.22	0.055	0.0094	perforation plate	80%	77.55	19.39	3.31	15.51	3.88	0.66
Load out - (Truck/Railcar/Barge)**	705,027	0.086	0.029	0.0049	spouts and sleeves or baghouse #1 or baghouse #2	80%	30.32	10.22	1.73	6.06	2.04	0.35
Storage - Silos and Bins	705,027	0.025	0.0063	0.0011	enclosed	90%	8.81	2.22	0.39	0.88	0.22	0.04
						Totals	**223.14**	**76.60**	**13.04**	**38.04**	**11.29**	**1.91**

Methodology
For the potential to emit, IDEM has assumed all grain is received by straight truck, cleaned, dried, and shipped out by straight truck.
Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03)
*Pursuant to AP42 Section 9.9.1.3 item (4), in cases where emissions from an internal cleaner are not controlled with a fabric filter or cyclone control device, the headhouse and internal operations emission factor accounts for any internal emissions from equipment within the structure that might escape to the atmosphere.
**Shipping by truck produces more particulate emissions than shipping by railcar or barge. To constitute a realistic maximum particulate emissions IDEM has assumed all shipping is handled by truck.
Receiving - Straight Truck (tons/yr) = Maximum Throughput Truck Receiving Pits (bushels/hr) x 60 lbs/bushel x 1 ton/2000 lbs x 8760 hrs/yr
PTE of PM/PM10/PM2.5 Before Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs
PTE of PM/PM10/PM2.5 After Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs x (1- Control Efficiency (%))

3. Maximum Permanent Storage Capacity (bushels) for NSPS Subpart DD Applicability

Unit	Maximum Storage Capacity (bushels)
Bin 2	15,018
Bin 3	15,018
Bin 4	15,018
Bin 5	3,739
Bin 6	4,541
Bin 7	4,541
Bin 8	4,541
Bin 9	4,541
Bin 10	3,739
Bin 11	1,910
Bin 12	1,910
Bin 13	2,750
Bin 100	16,634
Bin 101	16,634
Bin 102	16,634
Bin 103	16,634
Bin 104	16,634
Bin 200	5,136
Bin 201	13,085
Bin 202	13,085
Bin 203	13,085
Bin 204	13,085
Bin 205	5,136
Bin 300	16,634
Bin 301	16,634
Bin 302	16,634
Bin 303	16,634
Bin 304	16,634
Bin 500	21,383
Bin 501	21,675
Bin 502	21,993
Bin 503	21,993
Bin 504	21,993
Bin 505	21,993
Bin 600	14,323
Bin 601	14,323
Bin 602	14,323
Bin 603	14,492
Bin 604	14,492
Bin 605	6,745
Bin 700	21,940
Bin 701	21,675
Bin 702	21,993
Bin 703	21,993
Bin 704	21,993
Bin 705	21,993
Bin 801	146,000
Bin 802	146,000
Total	**939,533**

*Note: Pursuant to NSPS Subpart DD, 40 CFR 60.301 (Definitions), "permanent storage capacity" means grain storage capacity which is inside a building, bin, or silo. The storage capacity of the ground pile is considered a bin and is included in the "permanent storage capacity" of the grain elevator.

TSD Appendix A: Emission Calculations
Grain Elevator: Grain Byproducts and Soybean Byproducts Receiving, Handling, and Shipping

Company Name: ADM Grain Company
Source Address: 2350 Broadway Avenue, Evansville, IN 47712
Permit No.: M163-31595-00042
Reviewer: Susann Brown

1. Unlimited PTE Calculations

	Maximum Throughput (tons/hr)	Maximum Annual Operating Hours (hours/yr)	Potential Throughput (tons/yr)
Total	33	8,760	289,080

Emissions Unit Description	Maximum Grain Throughput (tons/yr)	PM Emission Factor (lbs/ton)***	PM10 Emission Factor (lbs/ton)***	PM2.5 Emission Factor (lbs/ton)***	Control Device(s)	Collection and Control Efficiency (%)	Unlimited PTE of PM Before Control (tons/yr)	Unlimited PTE of PM10 Before Control (tons/yr)	Unlimited PTE of PM2.5 Before Control (tons/yr)	Unlimited PTE of PM After Control (tons/yr)	Unlimited PTE of PM10 After Control (tons/yr)	Unlimited PTE of PM2.5 After Control (tons/yr)
Receiving - Straight Truck or Railcar	289,080	0.18	0.059	0.010	baghouse #2	90%	26.02	8.53	1.45	2.60	0.85	0.14
Internal Handling and Grain Cleaning Operations	289,080	0.061	0.034	0.0058	enclosed and baghouse #1 and baghouse #2	90%	8.82	4.91	0.84	0.88	0.49	0.08
Loadout - Barge *	289,080	0.016	0.029	0.0049	baghouse #1	90%	2.31	4.19	0.71	0.23	0.42	0.07
Storage - Silos and Bins **	0	0.025	0.0063	0.0011	None	0%	0.00	0.00	0.00	0.00	0.00	0.00
						Totals	**37.15**	**17.63**	**2.99**	**3.71**	**1.76**	**0.30**

2. Limited PTE Calculations

	Limited Throughput (tons/yr)****
Total	200,000

Emissions Unit Description	Limited Grain Throughput (tons/yr)	PM Emission Factor (lbs/ton)***	PM10 Emission Factor (lbs/ton)***	PM2.5 Emission Factor (lbs/ton)***	Control Device(s)	Collection and Control Efficiency (%)	Limited PTE of PM Before Control (tons/yr)	Limited PTE of PM10 Before Control (tons/yr)	Limited PTE of PM2.5 Before Control (tons/yr)	Limited PTE of PM After Control (tons/yr)	Limited PTE of PM10 After Control (tons/yr)	Limited PTE of PM2.5 After Control (tons/yr)
Receiving - Straight Truck or Railcar	200,000	0.18	0.059	0.010	baghouse #2	90%	18.00	5.90	1.00	1.80	0.59	0.10
Internal Handling and Grain Cleaning Operations	200,000	0.061	0.034	0.0058	enclosed and baghouse #1 and baghouse #2	90%	6.10	3.40	0.58	0.61	0.34	0.06
Loadout - Barge *	200,000	0.016	0.029	0.0049	baghouse #1	90%	1.60	2.90	0.49	0.16	0.29	0.05
Storage - Silos and Bins **	0	0.025	0.0063	0.0011	None	0%	0.00	0.00	0.00	0.00	0.00	0.00
						Totals	**25.70**	**12.20**	**2.07**	**2.57**	**1.22**	**0.21**

Methodology
* Shipping of grain byproducts and soybean byproducts is only by barge.
**The source will not be storing grain byproducts and soybean byproducts.

***Since there are no AP-42 emissions factors for grain byproducts and soybean byproducts, the emission factors used as alternative emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03).

**** The above throughput and PM/PM10/PM2.5 limitations are intended to limit the PM/PM10/PM2.5 emissions before control and do not take into account PM/PM10/PM2.5 control provided by the Baghouse #1, Baghouse #2, or the enclosures on the internal handling equipment.

Maximum Throughput (tons/yr) = Maximum grain byproducts and soybean byproducts available from supplier.
Unlimited PTE of PM/PM10/PM2.5 Before Control (tons/yr) = [Maximum Throughput (tons/yr)] * [Emission Factor (lbs/ton)] * [ton/2,000 lbs]
Unlimited PTE of PM/PM10/PM2.5 After Control (tons/yr) = [Unlimited PTE of PM/PM10/PM2.5 Before Control (tons/yr)] * [1 - Control Efficiency]

Limited PTE of PM/PM10/PM2.5 Before Control (tons/yr) = [Limited Throughput (tons/yr)] * [Emission Factor (lbs/ton)] * [ton/2,000 lbs]
Limited PTE of PM/PM10/PM2.5 After Control (tons/yr) = [Limited PTE of PM/PM10/PM2.5 Before Control (tons/yr)] * [1 - Control Efficiency]

TSD Appendix A: Emissions Calculations
Grain Drying - Natural Gas Combustion
MM BTU/HR <100

Company Name: ADM Grain Company
Source Address: 2350 Broadway Ave Evansville, IN 47712
Permit Number: M163-31595-00042
Reviewer: Susann Brown

Unit	Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
Grain Dryer	31.6	1020	271.39
Totals	**31.6**		**271.39**

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMcf	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.26	1.03	1.03	0.081	13.57	0.75	11.40

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 assumed equal to PM10
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Hazardous Air Pollutants	HAPs - Organics*					HAPs - Metals*				
	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.850E-04	1.628E-04	1.018E-02	0.24	4.614E-04	6.785E-05	1.493E-04	1.900E-04	5.156E-05	2.850E-04

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

Potential to Emit Total HAPs (tons/year) = **0.26**

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,020,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Greenhouse Gases (GHGs)	Greenhouse Gas (GHG)		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	16283.29	0.31	0.30
Summed Potential Emissions in tons/yr	16284		
CO2e Total in tons/yr	16382		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N20 GWP (310).

Abbreviations

PM = Particulate Matter	DCB = Dichlorobenzene	CO2 = Carbon Dioxide
PM10 = Particulate Matter (<10 um)	Pb = Lead	CH4 = Methane
SO2 = Sulfur Dioxide	Cd = Cadmium	N2O = Nitrous Oxide
NOx = Nitrous Oxides	Cr = Chromium	CO2e = CO2 equivalent emissions
VOC - Volatile Organic Compounds	Mn = Manganese	
CO = Carbon Monoxide	Ni = Nickel	

TSD Appendix A: Emissions Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: ADM Grain Company
Source Address: 2350 Broadway Avenue Evansville, IN 47712
Permit Number: M163-31595-00042
Reviewer: Susann Brown

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Type of Traffic	Vehicle Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Semi-truck (entering plant) (one-way trip)	semi-truck	46.0	1.0	46.0	40.0	1840.0	430	0.081	3.7	1367.4
Semi-truck (leaving plant) (one-way trip)	semi-truck	46.0	1.0	46.0	40.0	1840.0	637	0.121	5.5	2025.6
			Total	**92.0**		**3680.0**			**9.3**	**3393.0**

Average Vehicle Weight Per Trip = 40.0 tons/trip
Average Miles Per Trip = 0.10 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	40.0	40.0	40.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	3.745	0.749	0.1838	lb/mile
Mitigated Emission Factor, Eext =	3.424	0.685	0.1681	lb/mile

Type of Traffic	Vehicle Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Semi-truck (entering plant) (one-way trip)	semi-truck	2.56	0.51	0.13	2.34	0.47	0.11
Semi-truck (leaving plant) (one-way trip)	semi-truck	3.79	0.76	0.19	3.47	0.69	0.17
		6.35	**1.27**	**0.31**	**5.81**	**1.16**	**0.29**

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Miranda Gerard
ADM Grain Company
4666 Faries Pkwy
Decatur, IL 62526

DATE: October 17, 2012

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

SUBJECT: Final Decision
MSOP
163-31595-00042

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

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

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

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

Final Applicant Cover letter.dot 11/30/07

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: Vanderburgh Evansville Public Library

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

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

Applicant Name: ADM Grain Company
Permit Number: 163-31595-00042

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	DPABST 10/17/2012 ADM Grain Company 163-31595-00042 (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		Miranda Gerard ADM Grain Company 4666 Faries Pkwy Decatur IL 62526 (Source CAATS) (CONFIRM DELIVERY)									
2		Jeffrey J Becker VP - US Grain Ops & Engineering ADM Grain Company 4666 Faries Pkwy Decatur IL 62526 *(RO CAATS)*									
3		Evansville City Council and Mayors Office 1NW MLK Blvd, Rm 302 Evansville IN 47708 *(Local Official)*									
4		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 *(Local Official)*									
5		Evansville Vanderburg Public Library 200 SE Martin Luther King Jr. Blvd Evansville IN 47708-1694 *(Library)*									
6		Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 *(Affected Party)*									
7		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 *(Affected Party)*									
8		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 *(Health Department)*									
9		Kim Sherman 3355 Woodview Drive Newburgh IN 47630 *(Affected Party)*									
10		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 *(Affected Party)*									
11		Mr. John Blair 800 Adams Ave Evansville IN 47713 *(Affected Party)*									
12		Evansville EPA 100 E. Walnut St. Suite 100, Newsome Center Evansville IN 47713 *(Local Official)*									
13		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)									
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

FACSIMILIE OF PS Form 3877