



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

TO: Interested Parties / Applicant

DATE: September 12, 2012

RE: Consolidated Terminals & Logistics Company / 129-31925-00054

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



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September 12, 2012

Jason May  
Consolidated Terminals and Logistics Company  
P.O. Box 547  
Mount Vernon, IN 47620

Re: 129-31925-00054  
Second Significant Revision to  
F129-27917-00054

Dear Mr. May:

Consolidated Terminals and Logistics Company was issued a Federally Enforceable State Operating Permit (FESOP) No. F129-27917-00054 on December 2, 2009, for a stationary dry distillers grains with solubles (DDGS) and bulk products transfer source located at 2801 Bluff Road, Mount Vernon, Indiana 47620. On May 23, 2012, the Office of Air Quality (OAQ) received an application from the source requesting to construct and operate a new direct reduced iron (DRI) transfer operation, in which material will be conveyed by enclosed or covered conveyor from barges to a warehousing building and then to railcars or, alternatively, from barges directly to railcars. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Summer Keown, of my staff, at 317-234-5175 or 1-800-451-6027, and ask for extension 4-5175.

Sincerely,



Nathan C. Bell, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document and revised permit

NCB/SK

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



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## New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Consolidated Terminals and Logistics Company  
2801 Bluff Road  
Mount Vernon, Indiana 47620**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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 FESOP under 326 IAC 2-8.

Operation Permit No. F129-27917-00054	
Original Signed by: Alfred C. Dumauual, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: December 2, 2009  Expiration Date: December 2, 2014
First Significant Permit Revision No. 129-29175-00054, issued February 7, 2011 First Administrative Amendment No. 129-30331-0054, issued April 18, 2011	
Second Significant Permit Revision No. 129-31925-00054	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 12, 2012 Expiration Date: December 2, 2014

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-8-3(b)]

---

The Permittee owns and operates a stationary dry distillers grains with solubles (DDGS) and bulk products transfer source.

Source Address:	2801 Bluff Road, Mount Vernon, Indiana 47620
General Source Phone Number:	(812) 838-4017
SIC Code:	5191 (Farm Supplies) 4491 (Marine Cargo Handling)
County Location:	Posey
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 [326 IAC 2-8-3(c)(3)]

---

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

- (a) Dry distillers grains with solubles (DDGS) and bulk products receiving and handling operations. The DDGS and bulk products are already dried and cleaned when received. These operations include the following:
  - (1) One (1) DDGS and bulk products receiving dump pit, with choke unloading, identified as P-3, approved for construction in 2009, with a maximum capacity of 700 tons of DDGS and bulk products per hour, and a limited capacity of 1,000,000 tons of DDGS and bulk products per year, and exhausting to the atmosphere.
  - (2) Two (2) covered conveyors, identified as C-1 and C-2, approved for construction in 2009, with maximum a capacity of 700 tons of DDGS and bulk products per hour, and a limited capacity of 1,000,000 tons of DDGS and bulk products per year, and exhausting to the atmosphere.
  - (3) Paved and unpaved roads.
- (b) DDGS, bulk products and submerged ethanol loadout operation consisting of the following emission unit:
  - (1) One (1) DDGS, bulk products, and ethanol barge loadout spout, identified as S-4, approved for construction in 2009 and exhausting to the atmosphere, with the following:
    - (A) a maximum capacity of 700 tons of DDGS and bulk products per hour and a limited capacity of 1,000,000 tons of DDGS and bulk products per 12 consecutive month period and;

- (B) a limited capacity of 600,000,000 gallons of ethanol per 12 consecutive month period, using a vapor recovery unit for VOC control.
- (c) One (1) direct reduced iron (DRI) transfer operation, approved in 2012 for construction, with a maximum capacity of 600 tons per hour, including:
  - (1) Barge unloading, identified as D-0.
  - (2) One (1) hopper, identified as D-1.
  - (3) Eight (8) covered conveyors, identified as D-2, D-3, D-5, D-7, D-9, D-11, D-12 and D-14.
  - (4) 3-way valve, identified as D-4.
  - (5) Warehouse building, identified as D-6.
  - (6) Railcar Loadout, identified as D-10.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

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

### B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

---

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

---

- (a) This permit, F129-27917-00054, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### B.5 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.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

---

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

**B.7 Severability [326 IAC 2-8-4(4)]**

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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.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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- (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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

---

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
  - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

---

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

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

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

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Southwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

Facsimile Number: 317-233-6865

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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**B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F129-27917-00054 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.18 Permit Renewal [326 IAC 2-8-3(h)]**

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- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a

certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][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 FESOP 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.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

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

#### C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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.

### **Testing Requirements [326 IAC 2-8-4(3)]**

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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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 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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

### **Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

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

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

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

within 180 days from the date on which this source commences operation.

The ERP does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (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. Support information includes the following:
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following:
  - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
  - (BB) The dates analyses were performed.
  - (CC) The company or entity that performed the analyses.
  - (DD) The analytical techniques or methods used.
  - (EE) The results of such analyses.
  - (FF) The operating conditions as existing at the time of sampling or measurement.

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

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.

**C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

**C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Dry distillers grains with solubles (DDGS) and bulk products receiving and handling operations. The DDGS and bulk products are already dried and cleaned when received. These operations include the following:
- (1) One (1) DDGS and bulk products receiving dump pit, with choke unloading, identified as P-3, approved for construction in 2009, with a maximum capacity of 700 tons of DDGS and bulk products per hour, and a limited capacity of 1,000,000 tons of DDGS and bulk products per year, and exhausting to the atmosphere.
  - (2) Two (2) covered conveyors, identified as C-1 and C-2, approved for construction in 2009, with maximum a capacity of 700 tons of DDGS and bulk products per hour, and a limited capacity of 1,000,000 tons of DDGS and bulk products per year, and exhausting to the atmosphere.
  - (3) Paved and unpaved roads.
- (b) DDGS, bulk products and submerged ethanol loadout operation consisting of the following emission unit:
- (1) One (1) DDGS, bulk products, and ethanol barge loadout spout, identified as S-4, approved for construction in 2009 and exhausting to the atmosphere, with the following:
    - (A) a maximum capacity of 700 tons of DDGS and bulk products per hour and a limited capacity of 1,000,000 tons of DDGS and bulk products per 12 consecutive month period and;
    - (B) a limited capacity of 600,000,000 gallons of ethanol per 12 consecutive month period, using a vapor recovery unit for VOC control.
- (c) One (1) direct reduced iron (DRI) transfer operation, approved in 2012 for construction, with a maximum capacity of 600 tons per hour, including:
- (1) Barge unloading, identified as D-0.
  - (2) One (1) hopper, identified as D-1.
  - (3) Eight (8) covered conveyors, identified as D-2, D-3, D-5, D-7, D-9, D-11, D-12 and D-14.
  - (4) 3-way valve, identified as D-4.
  - (5) Warehouse building, identified as D-6.
  - (6) Railcar Loadout, identified as D-10.

(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 2-8-4(1)]**

**D.1.1 Particulate Matter [326 IAC 2-2] [326 IAC 2-8-4]**

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

- (a) The total throughput of dry distillers grains with solubles (DDGS) and bulk products received at the source shall not exceed 1,000,000 tons of DDGS and bulk products per 12 consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit PM and PM10 from all other emission units at this source, shall limit the source-wide PM emissions to less than 250 tons per 12 consecutive month period and source-wide PM10 emissions to less than 100 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from each of the listed emission units shall be limited by the following:

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

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

or

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

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

Emissions Units	Maximum Process Weight (tons/hour) for each unit of that type	326 IAC 6-3 Allowable Emission Rate (lbs/hr) for each unit of that type
Railcar & Truck unloading Pit	700.00	73.06
Covered pit conveyor	700.00	73.06
Covered barge conveyor	700.00	73.06
Barge loadout spout	700.00	73.06
DRI transfer operation	600.00	71.16

**D.1.3 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]**

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (a) The VOC emissions from the submerged ethanol loadout operation after control shall not exceed 0.01454 pounds per kilogallon of liquid loaded; and
- (b) The total throughput of ethanol at ethanol loadout operation shall be less than 600,000,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than one hundred (100) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

#### D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the Permittee shall control the VOC emissions from the submerged ethanol loadout operation using the Best Available Control Technology (BACT), which has been determined to be the following:

- (a) The VOC emissions from the submerged ethanol loadout operation shall be collected and controlled by an adsorption/absorption hydrocarbon vapor recovery system; and
- (b) The overall VOC control efficiency for the carbon adsorption/absorption hydrocarbon vapor recovery system (including the capture efficiency and removal efficiency) shall be no less than 98%.

#### D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities. 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.1.6 VOC Control

In order to comply with the requirements of Conditions D.1.3(a), D.1.4(a), and D.1.4(b), a carbon adsorption/absorption vapor recovery system shall be in operation and control emissions from the submerged ethanol loadout operation at all times the unit is in operation.

#### D.1.7 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate the compliance status with Conditions D.1.3(a), D.1.4(a), and D.1.4(b), the Permittee shall perform VOC (including inlet and outlet emission rates, removal efficiency, and capture efficiency) testing of the carbon adsorption/absorption vapor recovery system not later than 60 days after achieving the maximum production, but not later than 180 days after initial startup, utilizing methods approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### D.1.8 Carbon Adsorption/Absorption Vapor Recovery System Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the carbon adsorption/absorption vapor recovery system for measuring the non-methane VOC concentration in the vapor recovery system outlet vent. For the purpose of this condition, continuous means no less often than once per minute. The output of this system shall be recorded as 3-hour average.
- (b) From the date of startup until the stack test results are available, the Permittee shall operate the vapor recovery system and control emissions in the vapor recovery system outlet vent to less than a 3-hour average non-methane VOC concentration of 0.28% by volume. When for any one reading, the 3-hour average non-methane VOC concentration in the vapor recovery system outlet vent is equal to or greater than 0.28%

by volume, the Permittee shall take reasonable response steps. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 3-hour average non-methane VOC concentration in the vapor recovery system outlet vent that is equal to or greater than 0.28% by volume is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (c) The Permittee shall determine the 3-hour average non-methane VOC concentration from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.4.
- (d) On and after the date the stack test results are available, the Permittee shall operate the carbon adsorption/absorption vapor recovery system and control emissions in the vapor recovery system outlet vent to a concentration equal to or less than the 3-hour average non-methane VOC concentration as observed during the compliant stack test. When for any one reading, the 3-hour average non-methane VOC concentration in the vapor recovery system outlet vent is greater than the 3-hour average non-methane VOC concentration as observed during the compliant stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 3-hour average non-methane VOC concentration in the vapor recovery system outlet vent that is greater than the 3-hour average non-methane VOC concentration as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (e) The continuous monitoring system used for measuring the non-methane VOC concentration in the vapor recovery system outlet vent 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 day or other time period specified by the manufacturer. The Permittee shall maintain records of the manufacturer specifications, if used.

#### D.1.9 Carbon Adsorption/Absorption Vapor Recovery System Inspections

The Permittee shall conduct inspections, at least once per quarter, of the carbon adsorption/absorption vapor recovery system, including inspections of the inlet and outlet of the control system. The Permittee shall repair all defects detected.

#### D.1.10 Carbon Adsorption/Absorption Vapor Recovery System Failure Detection

In the event that a failure of the carbon adsorption/absorption vapor recovery system has been detected, the failed system and the associated ethanol loadout operation will be shut down immediately until the failed system has been repaired or replaced. The ethanol loadout operation shall be shut down no later than the time necessary to complete the transfer any residual ethanol that existed in the transfer piping when the failure was detected. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Carbon adsorption/absorption vapor recovery system failure can be indicated by abnormal VOC concentration readings recorded by the continuous monitoring system or by other means as specified by the manufacturer.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **D.1.11 Recordkeeping Requirements**

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- (a) To document the compliance status with Condition D.1.1(a), the Permittee shall maintain monthly records of the throughput of dry distillers grains with solubles (DDGS) and bulk products received at the source.
- (b) To document the compliance status with Condition D.1.3(b), the Permittee shall maintain records of the throughput of ethanol loadout at the ethanol loadout operation for each month and each compliance period.
- (c) To document the compliance status with Conditions D.1.6 and D.1.8, the Permittee shall maintain continuous records of the 3-hour average non-methane VOC concentration in the vapor recovery system outlet vent and the 3-hour average non-methane VOC concentration used to demonstrate compliance during the most recent compliant stack test. The Permittee shall include in its records the time frames during which the carbon adsorption/absorption vapor recovery system is shutdown and the reason for the shutdown (e.g., the process did not operate that day). The Permittee shall also include in its records the dates and times when VOC breakthrough is measured for each of the activated carbon canisters associated with the carbon adsorption/absorption vapor recovery system.
- (d) To document the compliance status with Condition D.1.9, the Permittee shall maintain a record for each inspection of the carbon adsorption/absorption vapor recovery system and identify each defect that was detected (e.g., broken seal, gap or other defect).
- (e) Section C - General Recordkeeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

### **D.1.12 Reporting Requirements**

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A quarterly summary of the information to document the compliance status with Conditions D.1.1(a) and D.1.3(b) shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Consolidated Terminals and Logistics Company  
Source Address: 2801 Bluff Road, Mount Vernon, Indiana 47620  
FESOP Permit No.: F129-27917-00054

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Consolidated Terminals and Logistics Company  
Source Address: 2801 Bluff Road, Mount Vernon, Indiana 47620  
FESOP Permit No.: F129-27917-00054

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|--|

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Consolidated Terminals and Logistics Company  
 Source Address: 2801 Bluff Road, Mount Vernon, Indiana 47620  
 FESOP Permit No.: F129-27917-00054  
 Facility: Entire Source  
 Parameter: DDGS and bulk product throughput  
 Limit: Less than 1,000,000 tons of dry distillers grains with solubles (DDGS) and bulk products received at the source per 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  
COMPLIANCE AND ENFORCEMENT BRANCH**

**FESOP Quarterly Report**

Source Name: Consolidated Terminals and Logistics Company  
Source Address: 2801 Bluff Road, Mount Vernon, Indiana 47620  
FESOP Permit No.: F129-27917-00054  
Facility: Ethanol Loadout Operation  
Parameter: Ethanol Throughput  
Limit: Less than 600,000,000 gallons of ethanol loadout at the ethanol loadout operation per 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  
 COMPLIANCE AND ENFORCEMENT BRANCH  
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Consolidated Terminals and Logistics Company  
 Source Address: 2801 Bluff Road, Mount Vernon, Indiana 47620  
 FESOP Permit No.: F129-27917-00054

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP)

**Source Description and Location**

<b>Source Name:</b>	<b>Consolidated Terminals and Logistics Company</b>
<b>Source Location:</b>	<b>2801 Bluff Road, Mount Vernon, Indiana 47620</b>
<b>County:</b>	<b>Posey</b>
<b>SIC Code:</b>	<b>5191 (Farm Supplies) and 4491 (Marine Cargo Handling)</b>
<b>Operation Permit No.:</b>	<b>F129-27917-00054</b>
<b>Operation Permit Issuance Date:</b>	<b>December 2, 2009</b>
<b>Significant Permit Revision No.:</b>	<b>129-31925-00054</b>
<b>Permit Reviewer:</b>	<b>Summer Keown</b>

On May 23, 2012, the Office of Air Quality (OAQ) received an application from Consolidated Terminals and Logistics Company related to a modification to an existing stationary dry distillers grains with solubles (DDGS) and bulk products transfer source.

**Existing Approvals**

The source was issued FESOP No. F129-27917-00054 on December 2, 2009. The source has since received the following approvals:

- (a) Significant Permit Revision No. 129-29175-00054, issued on February 7, 2011; and
- (b) Administrative Amendment No. 129-30331-00054, issued on April 18, 2011.

**Source Definition**

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

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

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

The Aventine ethanol plant is owned by Aventine Renewable Energy Holdings, Inc. Aventine Renewable Energy Holdings, Inc. and Consolidated Grain and Barge Company are unrelated corporations. They do not have common directors on their board of directors and they do not have any corporate officers in common. There is no common ownership between the Aventine plant and the other two plants.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The CTL plant property is about 1,000 feet from the Aventine plant property. A dedicated pipeline transferring ethanol from the Aventine plant to the CTL plant directly connects the two plants. The plants have separate managers and separate production staff with no managers or other workers shuttling back and forth to be actively involved in the other plant. Part of any production process is the shipment of products to markets or customers. Although the Aventine plant is capable of shipping out its products by truck or railcar, the CTL plant performs most of the shipment function for the Aventine plant. The relatively short distance between the two plants enables them to operate in this manner, especially with respect to

the dedicated pipeline. The CTL plant and the Aventine plant are therefore adjacent, meeting the third part of the major source definition.

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

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

<b>County Attainment Status</b>
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The source is located in Posey County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx emissions are considered when evaluating the rule applicability relating to ozone. Posey County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Posey County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> 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<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**  
 Posey County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

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

**Status of the Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Rail/Truck Receiving Pit	17.50	3.90	0.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Covered Barge Conveyor	30.50	17.00	2.90	0.00	0.0	0.00	0.00	0.00	0.00	0.00
Covered Pit Conveyor	30.50	17.00	2.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DDGS and Bulk Products Loadout to Barge	8.00	2.00	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Ethanol Loadout to Barge	0.00	0.00	0.00	0.00	0.00	<25.03	0.00	0.00	0.00	0.00
Paved and Unpaved Roads	6.93	1.73	0.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Entire Source</b>	<b>93.43</b>	<b>41.63</b>	<b>6.91</b>	<b>0.00</b>	<b>0.00</b>	<b>&lt;25.03</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible These emissions are based upon FESOP SPR No. 129-29175-00054, issued on February 2, 2011. **The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Consolidated Terminals and Logistics Company on May 23, 2012, relating to the construction and operation of a new direct reduced iron (DRI) transfer operation, in which material will be conveyed by enclosed or covered conveyor from barges to a warehousing building and then to railcars or, alternatively, from barges directly to railcars.

The following is a list of the new emission units:

- (a) One (1) direct reduced iron (DRI) transfer operation, approved in 2012 for construction, with a maximum capacity of 600 tons per hour, including:
  - (1) Barge unloading, identified as D-0.
  - (2) One (1) hopper, identified as D-1.
  - (3) Eight (8) covered conveyors, identified as D-2, D-3, D-5, D-7, D-9, D-11, D-12 and D-14.
  - (4) 3-way valve, identified as D-4.
  - (5) Warehouse building, identified as D-6.
  - (6) Railcar Loadout, identified as D-10.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – FESOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP
DRI Transfer Operation	31.54	14.45	4.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Proposed Revision</b>	<b>31.54</b>	<b>14.45</b>	<b>4.47</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1)(E), because the revision involves the construction of an emission unit with potential to emit (PTE) greater than 25 tons per year.

**PTE of the Entire Source After Issuance of the FESOP Revision**

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, 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 Revision (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Rail/Truck Receiving Pit	17.50	3.90	0.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Covered Barge Conveyor	30.50	17.00	2.90	0.00	0.0	0.00	0.00	0.00	0.00	0.00
Covered Pit Conveyor	30.50	17.00	2.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DDGS and Bulk Products Loadout to Barge	8.00	2.00	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Ethanol Loadout to Barge	0.00	0.00	0.00	0.00	0.00	<25.03	0.00	0.00	0.00	0.00
Paved and Unpaved Roads	3.96	1.73	0.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DRI Transfer Operation	31.54	14.45	4.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Entire Source</b>	<b>124.96</b>	<b>56.08</b>	<b>11.38</b>	<b>0.00</b>	<b>0.00</b>	<b>&lt;25.03</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible *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". **The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

(a) FESOP and PSD Minor Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable, the source shall comply with the following:

- (1) The total throughput of dry distillers grains with solubles (DDGS) and bulk products received at the source shall not exceed 1,000,000 tons of DDGS and bulk products per 12 consecutive month period with compliance determined at the end of each month.
- (2) The VOC emissions from the submerged ethanol loadout operation after control shall not exceed 0.01454 pounds per kilogallon of liquid loaded; and
- (3) The total throughput of ethanol at ethanol loadout operation shall be less than 600,000,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit PM and PM10 from all other emission units at this source, shall limit the source-wide PM and PM10 emissions to less than one hundred (100) tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide VOC emission to less than one hundred (100) tons per twelve (12) consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

#### **Federal Rule Applicability Determination**

##### New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

##### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

##### Compliance Assurance Monitoring (CAM)

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to 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 Determination**

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)  
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new unit is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

- (e) 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 this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) 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.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because the revision does not have potential fugitive particulate emissions greater than 25 tons per year.

#### DRI Transfer Operation

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the direct reduced iron (DRI) transfer operation shall not exceed 71.16 pounds per hour when operating at a process weight rate of 600 tons per hour. The pound per hour limitation was calculated with the following equation:
- Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:
- $$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$
- Based on calculations, a control device is not needed to comply with this limit.
- (i) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The proposed revision is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the new operation is less than twenty-five (25) tons per year.
- (j) There are no other 326 IAC 8 Rules that are applicable to the direct reduced iron (DRI) transfer operation.

#### **Compliance Determination, Monitoring and Testing Requirements**

- (a) There are no compliance determination and monitoring requirements applicable to this proposed revision.
- (b) There are no testing requirements applicable to this proposed revision.

#### **Proposed Changes**

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

...

- (b) DDGS, bulk products and submerged ethanol loadout operation consisting of the following emission unit:
  - (1) One (1) DDGS, bulk products, and ethanol barge loadout spout, identified as S-4, approved for construction in 2009 and exhausting to the atmosphere, with the following:
    - (Aa) a maximum capacity of 700 tons of DDGS and bulk products per hour and a limited capacity of 1,000,000 tons of DDGS and bulk products per 12 consecutive month period and;
    - (Ba) a limited capacity of 600,000,000 gallons of ethanol per 12 consecutive month period, using a vapor recovery unit for VOC control.
  
- (c) **One (1) direct reduced iron (DRI) transfer operation, approved in 2012 for construction, with a maximum capacity of 600 tons per hour, including:**
  - (1) **Barge unloading, identified as D-0.**
  - (2) **One (1) hopper, identified as D-1.**
  - (3) **Eight (8) covered conveyors, identified as D-2, D-3, D-5, D-7, D-9, D-11, D-12 and D-14.**
  - (4) **3-way valve, identified as D-4.**
  - (5) **Warehouse building, identified as D-6.**
  - (6) **Railcar Loadout, identified as D-10.**

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

- (b) DDGS, bulk products and submerged ethanol loadout operation consisting of the following emission unit:
  - (1) One (1) DDGS, bulk products, and ethanol barge loadout spout, identified as S-4, approved for construction in 2009 and exhausting to the atmosphere, with the following:
    - (Aa) a maximum capacity of 700 tons of DDGS and bulk products per hour and a limited capacity of 1,000,000 tons of DDGS and bulk products per 12 consecutive month period and;
    - (Ba) a limited capacity of 600,000,000 gallons of ethanol per 12 consecutive month period, using a vapor recovery unit for VOC control.
  
- (c) **One (1) direct reduced iron (DRI) transfer operation, approved in 2012 for construction,**

**with a maximum capacity of 600 tons per hour, including:**

- (1) Barge unloading, identified as D-0.**
- (2) One (1) hopper, identified as D-1.**
- (3) Eight (8) covered conveyors, identified as D-2, D-3, D-5, D-7, D-9, D-11, D-12 and D-14.**
- (4) 3-way valve, identified as D-4.**
- (5) Warehouse building, identified as D-6.**
- (6) Railcar Loadout, identified as D-10.**

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

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from each of the listed emission units shall be limited by the following:

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

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

or

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

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

Emissions Units	Maximum Process Weight (tons/hour) for each unit of that type	326 IAC 6-3 Allowable Emission Rate (lbs/hr) for each unit of that type
Railcar & Truck unloading Pit	700.00	73.06
Covered pit conveyor	700.00	73.06
Covered barge conveyor	700.00	73.06
Barge loadout spout	700.00	73.06
<b>DRI transfer operation</b>	<b>600.00</b>	<b>71.16</b>

(b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

- (1) On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. The change is only to site of these rules in Section B - Operational Flexibility. IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.
- (2) IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping.
- (3) Conditions D.1.1, D.1.3, and D.1.5, and the Quarterly Report Forms have been revised to provide clarification.
- (4) IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

B.13 Preventative Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][~~326 IAC 2-8-5(a)(1)~~]

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...

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) **and (c)** ~~through (d)~~ without a prior permit revision, if each of the following conditions is met:  
...
  - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(2), (c)(1), and (d) **(b)(1) and (c)**. The Permittee shall make such records available, upon reasonable request, for public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d) **(b)(1) and (c)**.
- (b) Emission Trades [326 IAC 2-8-15(e)(b)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(e)(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)(c)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

...

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. **Support information includes the following:**
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.**Records of required monitoring information include the following:**
  - (AA) The date, place, as defined in this permit, and time of sampling or measurements.

- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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

...

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph.** Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

...

D.1.1 Particulate Matter [326 IAC 2-2] [326 IAC 2-8-4]

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**Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) -8-4 (FESOP) not applicable, the Permittee shall comply with the following:**

- (a) The total throughput of dry distillers grains with solubles (DDGS) and bulk products received at the source shall not exceed 1,000,000 tons of DDGS and bulk products per 12 consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit PM and PM10 from all other emission units at this source, shall limit the source-wide ~~total potential to emit~~ of PM emissions to less than 250 tons per 12 consecutive month period and **source-wide** PM10 emissions to less than 100 tons per 12 consecutive month period and shall render **the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.**

D.1.3 Volatile Organic Compounds (VOC) [~~326 IAC 2-2~~] [326 IAC 2-8-4]

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...

D.1.5 Preventive Maintenance Plan [~~326 IAC 1-6-3~~] [326 IAC 2-8-4(9)]

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...

FESOP QUARTERLY REPORT

...

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
<del>Month 1</del>			
<del>Month 2</del>			
<del>Month 3</del>			

...

FESOP QUARTERLY REPORT

...

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
<del>Month 1</del>			
<del>Month 2</del>			
<del>Month 3</del>			

...

FESOP QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT FORM:

...

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

...

### Conclusion and Recommendation

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 May 23, 2012.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 129-31925-00054. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Summer Keown 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) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.
- (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.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emission Calculations  
Potential to Emit Summary**

**Company Name: Consolidated Terminals and Logistics Company**  
**Source Address: 2801 Bluff Road, Mount Vernon, IN 47620**  
**Significant Permit Revision No.: 129-31925-00054**  
**Reviewer: Summer Keown**  
**Date: July 5, 2012**

Uncontrolled Potential To Emit (tons/year)												
Emission Units		PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHG as CO <sub>2</sub> e	Single HAP	Total HAPs	
Existing Units	Rail/Truck Receiving Pit	107.31	23.91	3.99	0.00	0.00	0.00	0.00	0.00	0.00	--	0.0
	Covered barge conveyer	187.03	104.24	17.78	0.00	0.00	0.00	0.00	0.00	0.00	--	0.0
	Covered pit conveyer	187.03	104.24	17.78	0.00	0.00	0.00	0.00	0.00	0.00	--	0.0
	DDGS and Bulk Products Loadout to Barge	49.06	12.26	1.69	0.00	0.00	0.00	0.00	0.00	0.00	--	0.0
	Ethanol Loadout to Barge	0.00	0.00	0.00	0.00	0.00	218.19	0.00	0.00	0.00	--	0.0
	Paved and unpaved roads	6.93	1.73	0.19	0.00	0.00	0.00	0.00	0.00	0.00	--	0.0
New Unit	DRI Transfer Operation	31.54	14.45	4.47	0.00	0.00	0.00	0.00	0.00	0.00	--	0.0
<b>Total</b>		<b>568.88</b>	<b>260.85</b>	<b>45.90</b>	<b>0.00</b>	<b>0.00</b>	<b>218.19</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>--</b>	<b>0.00</b>

Limited Potential to Emit (tons/year)												
Emission Units		PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHG as CO <sub>2</sub> e	Single HAP	Total HAPs	
Existing Units	Rail/Truck Receiving Pit	17.50	3.90	0.65	0.00	0.00	0.00	0.00	0.00	0.00	--	0.0
	Covered barge conveyer	30.50	17.00	2.90	0.00	0.00	0.00	0.00	0.00	0.00	--	0.0
	Covered pit conveyer	30.50	17.00	2.90	0.00	0.00	0.00	0.00	0.00	0.00	--	0.0
	DDGS and Bulk Products Loadout to Barge	8.00	2.00	0.28	0.00	0.00	0.00	0.00	0.00	0.00	--	0.0
	Ethanol Loadout to Barge	0.00	0.00	0.00	0.00	0.00	<25.03	0.00	0.00	0.00	--	0.0
	Paved and unpaved roads	6.93	1.73	0.19	0.00	0.00	0.00	0.00	0.00	0.00	--	0.0
New Unit	DRI Transfer Operation	31.54	14.45	4.47	0.00	0.00	0.00	0.00	0.00	0.00	--	0.0
<b>Total</b>		<b>124.96</b>	<b>56.08</b>	<b>11.38</b>	<b>0.00</b>	<b>0.00</b>	<b>&lt;25.03</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>--</b>	<b>0.00</b>

**Appendix A: Emission Calculations**  
**PM, PM10 and PM2.5 Emissions**  
**Bulk Dried Distillers Grain (DDGS) and Bulk Products Receiving and Barge Loadout Processes**

**Company Name: Consolidated Terminals and Logistics Company**  
**Source Address: 2801 Bluff Road, Mount Vernon, IN 47620**  
**Significant Permit Revision No.: 129-31925-00054**  
**Reviewer: Summer Keown**  
**Date: July 5, 2012**

**Uncontrolled PTE for direct transfer Rail/Truck to barge**

Unit Description	Max. Throughput Rate (tons/hr)	Uncontrolled PM Emission Factor (lbs/ton)	Uncontrolled Potential to Emit of PM (lbs/hr)	Uncontrolled Potential to Emit of PM (tons/yr)	Uncontrolled PM10 Emission Factor (lbs/ton)	Uncontrolled Potential to Emit of PM10 (lbs/hr)	Uncontrolled Potential to Emit of PM10 (tons/yr)	Uncontrolled PM2.5 Emission Factor (lbs/ton)	Uncontrolled Potential to Emit of PM2.5 (lbs/hr)	Uncontrolled Potential to Emit of PM2.5 (tons/yr)
Railcar & Truck unloading Pit	700	0.035	24.50	107.31	0.0078	5.46	23.91	0.0013	0.91	3.99
Covered pit conveyor	700	0.061	42.70	187.03	0.0340	23.80	104.24	0.0058	4.06	17.78
Covered barge conveyor	700	0.061	42.70	187.03	0.0340	23.80	104.24	0.0058	4.06	17.78
DDGS and Bulk Products Loadout to Barge	700	0.016	11.20	49.06	0.0040	2.80	12.26	0.00055	0.39	1.69
<b>Total</b>				<b>530.4</b>			<b>244.7</b>			<b>41.24</b>

Methodology

Emission factors for PM, PM10 and PM2.5 are from AP-42 Table 9.9.1-1 for Grain Receiving - Hopper truck receiving (SCC 3-02-005-51), Headhouse and grain handling (SCC 3-02-005-30), and Grain shipping - Barge (SCC 3-02-005-64)

Potential to Emit Before Control (lbs/hr) = Max. Throughput Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton)

Uncontrolled Potential To Emit (tons/yr) = Max. Throughput Rate (tons/hr) x Uncontrolled Emission Factor (lbs/ton) x 8760 hr/yr x 1 ton/2000 lbs x 1 unit each

**Limited Potential to Emit for direct transfer Rail/Truck to barge**

Unit Description	Annual Throughput Limit (tons/year)	Uncontrolled PM Emission Factor (lbs/ton)	Uncontrolled PM10 Emission Factor (lbs/ton)	Uncontrolled PM2.5 Emission Factor (lbs/ton)	Limited PTE of PM (tons/yr)	Limited PTE of PM10 (tons/yr)	Limited PTE of PM2.5 (tons/yr)
Railcar & Truck unloading Pit	1,000,000	0.035	0.0078	0.0013	17.50	3.90	0.65
Covered barge conveyor	1,000,000	0.061	0.0340	0.0058	30.50	17.00	2.90
Covered pit conveyor	1,000,000	0.061	0.0340	0.0058	30.50	17.00	2.90
DDGS and Bulk Products Loadout to Barge	1,000,000	0.016	0.0040	0.00055	8.00	2.00	0.28
<b>Total</b>					<b>86.50</b>	<b>39.90</b>	<b>6.73</b>

Methodology

Limited PTE is calculated based on the limited tons/year of DDGS

Limited PTE (tons/yr) = Limited Throughput Rate (tons/yr) x Uncontrolled Emission Factor (lbs/ton) x 1 ton/2000 lbs x 1 unit each

**Appendix A: Emission Calculations  
PM, PM10 and PM2.5 Emissions  
New Direct Reduced Iron (DRI) Transfer Operation**

**Company Name: Consolidated Terminals and Logistics Company  
Source Address: 2801 Bluff Road, Mount Vernon, IN 47620  
Significant Permit Revision No.: 129-31925-00054  
Reviewer: Summer Keown  
Date: July 5, 2012**

Unit Description	Maximum Throughput Rate (tons/hr)	Number of Transfer Points	Maximum Annual Hours of Unloading (hours/year)*	Uncontrolled Emission Factor (lbs/ton)			Uncontrolled Potential to Emit (PTE) (lbs/hr)			Uncontrolled Potential to Emit (PTE) (tons/yr)		
				PM	PM10	PM2.5	PM	PM10	PM2.5	PM	PM10	PM2.5
DRI Transfer Operation	600	9	4867	0.0024	0.0011	0.00034	12.96	5.94	1.84	31.54	14.45	4.47

**Methodology**

\*Maximum Annual Hours of Unloading is based on a batch barge unloading cycle time of 4.5 hours (2.5 hours of unloading + 2.0 hours) to move the empty barge and moor a full barge in its place.

Emission factors for PM, PM10 and PM2.5 are from AP-42 Table 12.5-4 for Pile formation - stacker pellet ore

Potential to Emit (lbs/hr) = Maximum Throughput Rate (tons/hr) \* Number of Transfer Points \* Uncontrolled Emission Factor (lbs/ton)

Potential to Emit (tons/yr) = [Potential to Emit (lbs/hr)] \* [Maximum Annual Hours of Unloading (hours/year)] / [2,000 lbs/ton]

**326 IAC 6-3-2 Allowable PM Emission Rate**

Unit	Total Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)	Uncontrolled PTE of PM (lbs/hr)
DRI Transfer Operation	600.00	71.16	12.96

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

$$E = 55.0 P^{0.11} - 40$$

where

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

**Appendix A: Emissions Calculations  
VOC Emissions from Ethanol Loadout to Barge Operations**

**Company Name: Consolidated Terminals and Logistics Company**  
**Source Address: 2801 Bluff Road, Mount Vernon, IN 47620**  
**Significant Permit Revision No.: 129-31925-00054**  
**Reviewer: Summer Keown**  
**Date: July 5, 2012**

**PTE of VOC from direct transfer Rail/Truck to barge**  
 Volume Denatured Ethanol Loaded (gallons) =

$$L_L = 12.46 \text{ SPM} / (T+460)$$

			S =	0.50	for submerged barges
$L_L =$	0.559	Barge Loading	P =	0.98	from MSDS
* $L_L =$	<b>0.727</b>	<b>Barge Loading with 30% error</b>	M =	47.19	calculated based upon 95% ethanol (MW 46.07) and 5% gasoline (MW 68.4)
			T =	516.00	Based on an average annual temperature of 56°F for Mount Vernon

Methodology for emission factor:

Pursuant to AP-42, Section 5.2-4, emissions from loading petroleum liquid can be estimated (with a probable error of ± 30 percent) using the following expression:

$$L_L = 12.46 \text{ SPM} / (T+460)$$

$L_L$  = loading loss, pounds per 1000 gallons (lb/10<sup>3</sup> gal) of liquid loaded

S = saturation factor

P = true vapor pressure of liquid loaded, pounds per square inch absolute (psia)

(see Figure 7.1-5, Figure 7.1-6, and Table 7.1-2)

M = molecular weight of vapors, pounds per pound-mole (lb/lb-mole) (see Table 7.1-2)

T = temperature of bulk liquid loaded, °R (°F + 460)

\*Therefore in order to calculate the maximum uncontrolled VOC emissions from ethanol loading,  $L_L$  was adjusted to account for 30% error.

Load Out Type	**Load Out (gal/yr)	Uncontrolled VOC Losses (lbs/yr)	Uncontrolled VOC Losses (tons/yr)	Control Efficiency	Controlled VOC Emissions (tons/year)
Rail/Truck to barge	600,000,000	436,377.4	218.19	98%	4.36

Methodology:

\*\* Source is proposing a throughput limit of 600,000,000 gallons per year from the barge loadout spout.

Uncontrolled VOC Losses (lbs/yr) = Loadout (gal/yr) x Loading Loss adjusted to account for 30% error (lb/kgal) x 1 kgal/1000 gal

Uncontrolled VOC Losses (tons/yr) = Uncontrolled VOC Losses (lbs/yr) x 1 ton/2000 lbs

Controlled VOC Emissions (tons/year) = Uncontrolled VOC Losses (tons/yr) x (1 - control efficiency)

Control efficiency required to comply with 326 IAC 8-1-6

**Appendix A: Emissions Calculations  
Fugitive Dust Emissions - Unpaved Roads**

**Company Name: Consolidated Terminals and Logistics Company  
Source Address: 2801 Bluff Road, Mount Vernon, IN 47620  
Significant Permit Revision No.: 129-31925-00054  
Reviewer: Summer Keown  
Date: July 5, 2012**

**Unpaved Roads at Industrial Site**

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

<sup>1</sup>Maximum Annual DDGS Received = 1,000,000 tons/yr

<sup>1</sup>Total maximum amount of DDGS is limited to 1,000,000 tons per year

Process	Vehicle Type	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/yr)
Receiving Vehicle Entering Full	Truck	15.0	25.0	40.0	40000.00	1600000.0	200	0.038	1515.15
<b>Total</b>						<b>40000</b>	<b>1600000</b>		<b>1515.15</b>

<sup>2</sup>Receiving Trucks will travel on unpaved roads to the facility and will leave empty on paved roads.

Average Vehicle Weight Per Trip = 40.0 tons/trip  
Average Miles Per Trip = 0.038 miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	6.4	6.4	6.4	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 municipal solid waste landfills plant road) = constant (AP-42 Table 13.2.2-2)
a =	0.7	0.9	0.9	
W =	40.0	40.0	40.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext =  $E * [(365 - P)/365]$

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

where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	10.12	2.73	0.27	lb/mile
Mitigated Emission Factor, Eext =	6.66	1.80	0.18	lb/mile

Process	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)
Receiving Vehicle Entering Full	Truck	7.67	2.07	0.21	5.04	1.36	0.14
<b>Totals</b>		<b>7.67</b>	<b>2.07</b>	<b>0.21</b>	<b>5.04</b>	<b>1.36</b>	<b>0.14</b>

**Methodology**

Maximum Annual Grain Throughput (tons/yr) = [Maximum Annual Grain Throughput (bushels/yr)] \* [Bulk Density of Grain (tons/bushel)]  
 Maximum Weight of Vehicle and Load (tons/trip) = [Maximum Weight of Vehicle (tons/trip)] + [Maximum Weight of Load (tons/trip)]  
 Maximum trips per year (trip/yr) = [Throughput (tons/yr)] / [Maximum Weight of Load (tons/trip)]  
 Total Weight driven per year (ton/yr) = [Maximum Weight of Vehicle and Load (tons/trip)] \* [Maximum trips per year (trip/yr)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/yr) = [Maximum trips per year (trip/yr)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per year (ton/yr)] / SUM[Maximum trips per year (trip/yr)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/yr)] / SUM[Maximum trips per year (trip/yr)]  
 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 1) \* (1 - Dust Control Efficiency 2)

**Abbreviations**

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

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name: Consolidated Terminals and Logistics Company**  
**Source Address: 2801 Bluff Road, Mount Vernon, IN 47620**  
**Significant Permit Revision No.: 129-31925-00054**  
**Reviewer: Summer Keown**  
**Date: July 5, 2012**

**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 (12/2003).

<sup>1</sup>Maximum Annual DDGS Received =  tons/yr

<sup>1</sup>Total maximum amount of DDGS is limited to 1,000,000 tons per year

Process	Vehicle Type	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/yr)
Receiving Vehicle/Truck Leave Empty	Truck	15.0	0.00	15.0	40000.0	600000.0	1300.0	0.246	9848.5
<b>Total</b>					<b>40000.0</b>	<b>600000.0</b>			<b>9848.5</b>

<sup>2</sup>Receiving Trucks will travel on unpaved roads to the facility and will leave empty on paved road

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

Unmitigated Emission Factor, Ef = [k \* (sL/2)<sup>0.65</sup> \* (W/3)<sup>1.5</sup> - C] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	15.0	15.0	15.0	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00036	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E \* [1 - (p/4N)]

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.42	0.08	0.01	lb/mile
Mitigated Emission Factor, Eext =	0.38	0.07	0.01	lb/mile

Process	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)
Receiving Vehicle/Truck Leave Empty	Truck	2.06	0.40	0.06	1.89	0.37	0.05
		<b>2.06</b>	<b>0.40</b>	<b>0.06</b>	<b>1.89</b>	<b>0.37</b>	<b>0.05</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (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 = Particulate 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](http://www.idem.IN.gov)

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

**TO:** Jason May  
Consolidated Terminals & Logistics Company  
P.O. Box 577  
Mount Vernon, IN 47620

**DATE:** September 12, 2012

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

**SUBJECT:** Final Decision  
Significant Permit Modification  
129-31925-00054

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

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

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

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

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

September 12, 2012

TO: Alexandrian Public Library

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

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

**Applicant Name: Consolidated Terminals & Logistics Company**  
**Permit Number: 129-31925-00054**

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

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

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	MIDENNEY 9/12/2012 Consolidated Terminals and Logistics Company 129-31925-00054 (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:  <b>CERTIFICATE OF MAILING ONLY</b>	

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2		Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
3		Posey County Commissioners County Courthouse, 126 E. 3rd Street Mount Vernon IN 47620 (Local Official)										
4		Posey County Health Department 126 E. 3rd St, Coliseum Bldg Mount Vernon IN 47620-1811 (Health Department)										
5		Mount Vernon City Council and Mayors Office 520 Main Street Mount Vernon IN 47620 (Local Official)										
6		Dr. Jeff Seyler Univ. of So Ind., 8600 Univ. Blvd. Evansville IN 47712 (Affected Party)										
7		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)										
8		Alexandrian Public Library 115 West 5th Mt. Vernon IN 47620 (Library)										
9		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)										
10		Mrs. Connie Parkinson 510 Western Hills Dr. Mt. Vernon IN 47620 (Affected Party)										
11		Robert Hess c/o Mellon Corporation 830 Post Road East, Suite 105 Westport CT 06880 (Affected Party)										
12		Juanita Burton 7911 W. Franklin Road Evansville IN 47712 (Affected Party)										
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