



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: October 23, 2012

RE: ADM Milling Company / 097 - 32098 - 00016

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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October 23, 2012

Joe Whitis
ADM Milling Company
PO Box 610
Beech Grove, IN 46107-0610

Re: 097-32098-00016
First Significant Revision to
F097-25351-00016

Dear Joe Whitis:

ADM Milling Company was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F097-25351-00016 on August 27, 2008, for a stationary grain elevator and a flour and milled wheat process facility, located at 854 Bethel Avenue, Beech Grove, IN 46107. On July 9, 2012, the Office of Air Quality (OAQ) received an application from the source requesting the following:

- 1) Construction and operation of additional units in the Cleaning House (ES4), Mill House (ES5), Bulk Plan and Product Loadout (ES6), and the Feed Storage, Handling, & Loadout (ES7).
- 2) That the allowable particulate concentrations (and resultant emission rates) of several sources with baghouse controls be adjusted downwards.
- 3) That control device (CD36 (Feed Drag Conveyor) be listed in Appendix A: "Emission Calculations".
- 4) That CD26 be removed and CD28 be added back.

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 Deena Patton, of my staff, at 317-234-5400 or 1-800-451-6027, and ask for extension 4-5400.

Sincerely,



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

Attachments: Technical Support Document and revised permit

NCB/DP

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



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Federally Enforceable State Operating Permit Renewal

Indiana Department of Environmental Management Office of Air Quality

**ADM Milling Company
854 Bethel Avenue
Beech Grove, Indiana 46107**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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. F097-25351-00016	
Original signed/Issued by: Kyle Walker Deputy Director, DPW	Issuance Date: August 27, 2008 Expiration Date: August 27, 2018

First Administrative Amendment No. 097-28480-00016 issued October 7, 2009
Second Administrative Amendment No. 097-30256-00016, issued May 2, 2011

First Significant Permit Revision No. 097-32098-00016	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 23, 2012 Expiration Date: August 27, 2018

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Attachment A: New Source Performance Standards (NSPS) for Grain Elevators [40 CFR 60, Subpart DD]

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.4 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 grain elevator and a flour and milled wheat process.

Source Address:	854 Bethel Avenue, Beech Grove, Indiana 46107
General Source Phone Number:	(317) 783-3321
SIC Code:	2041 (Flour and Other Grain Mill Products)
County Location:	Marion
Source Location Status:	Nonattainment for PM-2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Nonattainment NSR 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) Grain receiving area, identified as emission unit ES1, constructed in 1992, with a maximum capacity of 750 tons/hr. Grain receiving is separated into areas and enclosures for both truck and railcar receiving. Truck unloading is aspirated to a baghouse, identified as CD1, and exhausting to stack S1. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (b) Grain loadout, identified as emission unit ES2, constructed in 1992, with a maximum capacity of 900 tons/hr. Grain loadout is separated into areas and enclosures for both truck and railcar loadout. Railcar loading is aspirated to a baghouse, identified as CD2, and exhausting to stack S2. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (c) Grain storage and handling, identified as emission unit ES3, constructed in 1992 and consists of 123 bins, conveyors, transfer points, with a maximum capacity for grain handling of 750 tons/hr. 123 bins have a total storage capacity of 5,835,000 bushels, and are controlled by three (3) baghouses, identified as CD3, CD4, and CD5, and exhausting to stacks S3, S4 and S5, respectively. Fugitive emissions from grain handling are controlled by enclosed conveyors and transfer points.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (d) Cleaning house, identified as emission unit ES4, constructed in 1992, approved for modification in 2012, with a maximum capacity of 78 tons/hr. The wheat cleaning house is controlled by eight (8) baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11,

CD12 and CD38, and exhausting to stacks S6, S7, S8, S9, S10, S11 S12 and S38, respectively.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (e) Mill house, identified as emission unit ES5, constructed in 1992, approved for modification in 2012, with a maximum capacity of 78 tons/hr. The mill house consists of skimmers, stream blenders, purifiers, rollstands, stock hoppers, pinmills, and hammermills. The mill house is controlled by eighteen (18) baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, CD24, CD37, CD39, CD40, CD41, CD42, and CD43, exhausting to stacks S13, S14, S15, S16, S17, S18, S19, S20, S21, S22, S23, S24, S36, S39, S40, and S41, respectively. CD42 and CD43 exhaust indoors.
- (f) Bulk plant and product loadout, identified as emission unit ES6, constructed in 1992, approved for modification in 2012, with a maximum capacity of 200 tons/hr. The flour bulk plant includes a bagging operation, loadout bins, sifters, and scales, with an enclosed loadout area for bulk shipment via trucks and railcars. Bulk plant and product loadout is controlled by ten (10) baghouses, identified as CD25, CD28, CD29, CD30, CD31, CD44, CD45, CD46, CD47, and CD48, and exhausting to stacks S25, S26, S29, S30 S31, S42, S43, and S44, respectively. CD44 and CD45 exhaust indoors.
- (g) Mill feed storage, handling and loadout, identified as emission unit ES7, constructed in 1992, approved for modification in 2012, with a maximum capacity of 120 tons/hr, and consisting of screening bins, feed bins, conveying and loadout. The mill feed storage, handling and loadout is controlled by seven (7) baghouses, identified as CD32, CD33, CD34, CD35, CD36, CD49, and CD50, and exhausting to stacks S32, S33, S34, S35 S36, S45, and S46, respectively.
- (g) Mill feed storage, handling and loadout, identified as emission unit ES7, constructed in 1992, approved for modification in 2012, with a maximum capacity of 120 tons/hr, and consisting of screening bins, feed bins, conveying and loadout. The mill feed storage, handling and loadout is controlled by seven (7) baghouses, identified as CD32, CD33, CD34, CD35, CD36, CD49, and CD50, and exhausting to stacks S32, S33, S34, S35 S36, S49, and S50, respectively.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour (326 IAC 6-2-4), consisting of:
 - (1) Boiler #1, with a maximum heat input capacity of 5.0 MMBtu/hr,
 - (2) Boiler #2, with a maximum heat input capacity of 5.0 MMBtu/hr,
 - (3) Boiler #3, with a maximum heat input capacity of 3.3 MMBtu/hr.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank of less than 10,500 gallon capacity, and dispensing less than 230,000 gallons per month:
- (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Degreasing operations that do not exceed 145 gallons per 12 months (326 IAC 8-3-2) (326 IAC 8-3-5);

- (e) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other filtration equipment;
- (f) Paved and unpaved roads and parking lots with public access (326 IAC 6-4);
- (g) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower; and
- (h) A laboratory as defined in 326 IAC 2-7-1(21)(D).

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) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F097-25351-00016, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [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.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

B.8 Certification [326 IAC 2-8-3(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.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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.10 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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

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

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.12 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, 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

- (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.

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

- (a) All terms and conditions of permits established prior to F097-25351-00016 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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.15 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]

(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.16 Permit Renewal [326 IAC 2-8-3(h)]

(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.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (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.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 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.21 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.22 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.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.24 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 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) and greenhouse gases (GHGs), 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.
 - (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) 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 one hundred (100) 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.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

All required notifications shall be submitted to:

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

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

- (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]

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)]

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)]

- (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]

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-8-4] [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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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

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) Grain receiving area, identified as emission unit ES1, constructed in 1992, with a maximum capacity of 750 tons/hr. Grain receiving is separated into areas and enclosures for both truck and railcar receiving. Truck unloading is aspirated to a baghouse, identified as CD1, and exhausting to stack S1. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (b) Grain loadout, identified as emission unit ES2, constructed in 1992, with a maximum capacity of 900 tons/hr. Grain loadout is separated into areas and enclosures for both truck and railcar loadout. Railcar loading is aspirated to a baghouse, identified as CD2, and exhausting to stack S2. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (c) Grain storage and handling, identified as emission unit ES3, constructed in 1992 and consists of 123 bins, conveyors, transfer points, with a maximum capacity for grain handling of 750 tons/hr. 123 bins have a total storage capacity of 5,835,000 bushels, and are controlled by three (3) baghouses, identified as CD3, CD4, and CD5, and exhausting to stacks S3, S4 and S5, respectively. Fugitive emissions from grain handling are controlled by enclosed conveyors and transfer points.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (d) Cleaning house, identified as emission unit ES4, constructed in 1992, approved for modification in 2012, with a maximum capacity of 78 tons/hr. The wheat cleaning house is controlled by eight (8) baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, CD12 and CD38, and exhausting to stacks S6, S7, S8, S9, S10, S11 S12 and S38, respectively.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

(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 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the Permittee shall comply with the following:

- (a) PM, PM10, and PM2.5 emissions from the truck receiving baghouse CD1, truck loadout baghouse CD2, and grain storage and handling baghouses CD3, CD4 and CD5, shall each not exceed 0.01 grain/dscf.
- (b) All grain receiving and loadout operations shall be conducted such that fugitive emissions are controlled by the three-sided enclosure.

- (c) The throughput of grain received (ES1) shall be limited to 1,164,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) The throughput of grain loaded out (ES2) shall be limited to 400,000 tons of grain per twelve (12) consecutive month period with compliance determined at the end of each month.
- (e) PM, PM10, and PM2.5 emissions from the cleaning house, identified as ES4, and controlled by eight (8) baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, CD12, and CD38 shall each not exceed 0.005 grain/dscf.

Compliance with the above limits, combined with the limits from D.2.1 and the potential emissions from all other units will limit source-wide PM emissions to less than 250 tons per twelve (12) consecutive month period, PM-10 and PM-2.5 emissions to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7, 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

D.1.2 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(d), the following shall apply to the grain receiving area, identified as emission unit ES1, the grain loadout area, identified as emission unit ES2, and the grain storage and handling areas, identified as emission unit ES3, as follows:

- (a) For any grain storage elevator located at any grain processing source that has a permanent grain storage capacity of thirty-five thousand two hundred (35,200) cubic meters (one million (1,000,000) U.S. bushels) or more shall be limited to particulate matter emissions of no greater than seven-hundredths (0.07) g/dscm (three hundredths (0.03) grain per dscf).
- (b) All grain elevators subject to this article shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:
 - (1) Housekeeping practices shall be conducted as follows:
 - (a) Areas to be swept and maintained shall include, at a minimum, the following:
 - (i) General grounds, yard, and other open areas.
 - (ii) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
 - (iii) Grain driers with respect to accumulated particulate matter.
 - (b) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (c) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (d) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

- (2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (a) Malfunctions.
 - (b) Breakdowns.
 - (c) Improper adjustment.
 - (d) Operating above the rated or designed capacity.
 - (e) Not following designed operating specifications.
 - (f) Lack of good preventive maintenance care.
 - (g) Lack of critical and proper spare replacement parts on hand.
 - (h) Lack of properly trained and experienced personnel.
- (3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.4 Particulate Control

- (a) The baghouses (CD1 through CD12 and CD38) for PM, PM-10 and PM-2.5 control shall be in operation and control emissions from ES1, ES2, ES3 and ES4 at all times that these facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify IDEM, OAQ of the expected date the failed units will be repaired or replace. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.5 Testing Requirements [326 IAC 2-1.1-11]

Not later than 180 days after issuance of this permit (F097-25351-00016), in order to determine compliance with Condition D.1.1, the Permittee shall perform PM and PM-10 emission stack testing for operation ES1, ES2, and ES3, utilizing the methods as approved by the IDEM, OAQ. This testing shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. PM-10 includes filterable and condensable PM-10. 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.1.6 Visible Emissions Notations

- (a) Visible emission notations of the baghouse exhausts associated with ES1, ES2, ES3 and ES4, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the pressure drop across baghouse CD1 through 12, used in conjunction with ES1, ES2, ES3 and ES4, at least once per day when this process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 1.0 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.

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

D.1.8 Broken or Failed Bag Detection

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

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

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

D.1.9 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1(c), the Permittee shall maintain records of the amount of grain received per twelve (12) consecutive month period. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the particulate emission limits established in Condition D.1.1.
- (b) To document the compliance status with Condition D.1.1(d), the Permittee shall maintain records of the amount of grain loaded out per twelve (12) consecutive month period. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the particulate emission limits established in Condition D.1.1.
- (c) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of ES1, ES2, ES3 and ES4. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (d) To document the compliance status with Condition D.1.7, the Permittee shall maintain records once per day of the pressure drop across the baghouse controlling ES1, ES2, ES3 and ES4. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (e) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1(c) and D.1.1(d) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to 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).

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (e) Mill house, identified as emission unit ES5, constructed in 1992, approved for modification in 2012, with a maximum capacity of 78 tons/hr. The mill house consists of skimmers, stream blenders, purifiers, rollstands, stock hoppers, pinmills, and hammermills. The mill house is controlled by eighteen (18) baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, CD24, CD37, CD39, CD40, CD41, CD42, and CD43, exhausting to stacks S13, S14, S15, S16, S17, S18, S19, S20, S21, S22, S23, S24, S36, S39, S40, and S41, respectively. CD42 and CD43 exhaust indoors.
- (f) Bulk plant and product loadout, identified as emission unit ES6, constructed in 1992, approved for modification in 2012, with a maximum capacity of 200 tons/hr. The flour bulk plant includes a bagging operation, loadout bins, sifters, and scales, with an enclosed loadout area for bulk shipment via trucks and railcars. Bulk plant and product loadout is controlled by ten (10) baghouses, identified as CD25, CD28, CD29, CD30, CD31, CD44, CD45, CD46, CD47, and CD48, and exhausting to stacks S25, S26, S29, S30, S31, S42, S43, and S44, respectively. CD44 and CD45 exhaust indoors.
- (g) Mill feed storage, handling and loadout, identified as emission unit ES7, constructed in 1992, approved for modification in 2012, with a maximum capacity of 120 tons/hr, and consisting of screening bins, feed bins, conveying and loadout. The mill feed storage, handling and loadout is controlled by seven (7) baghouses, identified as CD32, CD33, CD34, CD35, CD36, CD49, and CD50, and exhausting to stacks S32, S33, S34, S35, S36, S45, and S46, respectively.

(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.2.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate (PM) emissions from the mill house (identified as ES5), the bulk plant and product loadout (identified as ES6), and mill feed storage, handling and loadout (identified as ES7) shall not exceed three hundredths (0.03) grains per dry standard cubic foot of exhaust air.

D.2.2 FESOP Limits [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the Permittee shall comply with the following:

- (a) PM, PM10, and PM2.5 emissions from the mill house, identified as ES5, and controlled by eighteen (18) baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, CD24, CD37, CD39, CD40, CD41, CD42, and CD43, shall each not exceed 0.005 grain/dscf.
- (b) PM, PM10, and PM2.5 emissions from the bulk plant and product loadout, identified as ES6, and controlled ten (10) baghouses, identified as CD25, CD28, CD29, CD30, CD31, CD44, CD45, CD46, CD47, and CD48, shall each not exceed 0.005 grain/dscf.

- (c) PM, PM10, and PM2.5 emissions from the mill feed storage and handling, identified as ES7, and controlled by seven (7) baghouses, identified as CD32, CD33, CD34, CD35, CD36, CD49, and CD50, shall each not exceed 0.01 grain/dscf.
- (d) All mill feed loadout operations shall be conducted such that fugitive emissions are controlled by a three-sided enclosure.
- (e) The throughput of mill feed loaded out shall be limited to 249,600 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits, combined with the limits from D.1.1 and the potential emissions from all other units will limit source-wide PM emissions to less than 250 tons per twelve (12) consecutive month period, PM-10 and PM-2.5 emissions to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7, 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.4 Particulate Control

- (a) The baghouses (CD13 through CD25, CD28 through 37 and CD39 through CD50) for PM, PM-10 and PM-2.5 control shall be in operation and control emissions from ES5, ES6 and ES7 at all times that these facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify IDEM, OAQ of the expected date the failed units will be repaired or replace. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the baghouse exhausts associated with ES5, ES6 and ES7 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation

with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.6 Parametric Monitoring

The Permittee shall record the pressure drop across baghouses CD13 – CD25 and CD28-CD37, used in conjunction with ES5, ES6 and ES7, at least once per day when these processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 1.0 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.7 Broken or Failed Bag Detection

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

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

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

D.2.8 Record Keeping Requirement

- (a) To document the compliance status with Condition D.2.2(e), the Permittee shall maintain records of the amount of mill feed loaded out per twelve (12) consecutive month period. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the particulate emission limits established in Condition D.2.1.
- (b) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of ES5, ES6 and ES7. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (c) To document the compliance status with Condition D.2.6, the Permittee shall maintain records once per day of the pressure drop across the baghouses controlling ES5, ES6 and ES7. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

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

D.2.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.2.2(e) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to 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).

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour (326 IAC 6-2-4), consisting of:
 - (1) Boiler #1, with a maximum heat input capacity of 5.0 MMBtu/hr,
 - (2) Boiler #2, with a maximum heat input capacity of 5.0 MMBtu/hr,
 - (3) Boiler #3, with a maximum heat input capacity of 3.3 MMBtu/hr.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months.

(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.3.1 Particulate Emission Limitations for Sources of Indirect Heating (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the two (2) 5.0 MMBtu per hour heat input boilers and one (1) 3.3 MMBtu per hour boiler shall be limited to 0.54 pounds per hour.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operating requirement;
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch)

measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

- (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION E.1

FACILITY OPERATING CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) Grain receiving area, identified as emission unit ES1, constructed in 1992, with a maximum capacity of 750 tons/hr. Grain receiving is separated into areas and enclosures for both truck and railcar receiving. Truck unloading is aspirated to a baghouse, identified as CD1, and exhausting to stack S1. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (b) Grain loadout, identified as emission unit ES2, constructed in 1992, with a maximum capacity of 900 tons/hr. Grain loadout is separated into areas and enclosures for both truck and railcar loadout. Railcar loading is aspirated to a baghouse, identified as CD2, and exhausting to stack S2. Fugitive particulate emissions are controlled by a three sided enclosure which is rated at 60% control efficiency.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (c) Grain storage and handling, identified as emission unit ES3, constructed in 1992 and consists of 123 bins, conveyors, transfer points, with a maximum capacity for grain handling of 750 tons/hr. 123 bins have a total storage capacity of 5,835,000 bushels, and are controlled by three (3) baghouses, identified as CD3, CD4, and CD5, and exhausting to stacks S3, S4 and S5, respectively. Fugitive emissions from grain handling are controlled by enclosed conveyors and transfer points.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (d) Cleaning house, identified as emission unit ES4, constructed in 1992, approved for modification in 2012, with a maximum capacity of 78 tons/hr. The wheat cleaning house is controlled by eight (8) baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, CD12 and CD38, and exhausting to stacks S6, S7, S8, S9, S10, S11 S12 and S38, respectively.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

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

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the facilities described in Section E.1 except as otherwise specified in 40 CFR Part 60, Subpart DD.
- (b) Pursuant to 40 CFR 60.19, the Permittee shall submit all required notifications and reports 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

E.1.2 Standards of Performance for Grain Elevators [40 CFR 60, Subpart DD] [326 IAC 12]

Pursuant to 40 CFR 60, Subpart DD, the Permittee shall comply with the provisions of Standards of Performance for Grain Elevators, which are incorporated by reference as 326 IAC 12, (included as Attachment A of this permit) as specified as follows:

- (a) 40 CFR 60.300;
- (b) 40 CFR 60.301;
- (c) 40 CFR 60.302;
- (d) 40 CFR 60.303; and
- (e) 40 CFR 60.304.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107
FESOP Permit No.: F097-25351-00016

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: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107
FESOP Permit No.: F097-25351-00016

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• 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• 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 |
|---|

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 ₂ , VOC, NO _x , 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: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107
FESOP Permit No.: F097-25351-00016
Facility: ES1 - Grain Receiving
Parameter: PM-10 / PM-2.5 emissions
Limit: The throughput of grain received is restricted to 1,164,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month

Quarter: _____ Year: _____

Month	Grain Received	Grain Received	Grain Received
	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: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107
FESOP Permit No.: F097-25351-00016
Facility: ES2 - Grain Loadout
Parameter: PM-10 / PM-2.5 emissions
Limit: The throughput of grain loaded out is restricted to 400,000 tons of grain per twelve (12) consecutive month period with compliance determined at the end of each month.

Quarter: _____ Year: _____

Month	Grain Loadout	Grain Loadout	Grain Loadout
	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: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107
FESOP Permit No.: F097-25351-00016
Facility: ES7 - Mill feed loadout
Parameter: PM-10 / PM-2.5 emissions
Limit: The throughput of mill feed loaded out is restricted to 249,600 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Quarter: _____ Year: _____

Month	Mill feed loadout	Mill feed loadout	Mill feed loadout
	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: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107
FESOP Permit No.: F097-25351-00016

Months: _____ to _____ Year: _____

Page 1 of 2

<p>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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Attachment A

Title 40: Protection of Environment

PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

Subpart DD—Standards of Performance for Grain Elevators

Source: 43 FR 34347, Aug. 3, 1978, unless otherwise noted.

§ 60.300 Applicability and designation of affected facility.

(a) The provisions of this subpart apply to each affected facility at any grain terminal elevator or any grain storage elevator, except as provided under §60.304(b). The affected facilities are each truck unloading station, truck loading station, barge and ship unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations.

(b) Any facility under paragraph (a) of this section which commences construction, modification, or reconstruction after August 3, 1978, is subject to the requirements of this part.

[43 FR 34347, Aug. 3, 1978, as amended at 52 FR 42434, Nov. 5, 1988]

§ 60.301 Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.

(a) *Grain* means corn, wheat, sorghum, rice, rye, oats, barley, and soybeans.

(b) *Grain elevator* means any plant or installation at which grain is unloaded, handled, cleaned, dried, stored, or loaded.

(c) *Grain terminal elevator* means any grain elevator which has a permanent storage capacity of more than 88,100 m³ (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots.

(d) *Permanent storage capacity* means grain storage capacity which is inside a building, bin, or silo.

(e) *Railcar* means railroad hopper car or boxcar.

(f) *Grain storage elevator* means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 35,200 m³ (ca. 1 million bushels).

(g) *Process emission* means the particulate matter which is collected by a capture system.

(h) *Fugitive emission* means the particulate matter which is not collected by a capture system and is released directly into the atmosphere from an affected facility at a grain elevator.

(i) *Capture system* means the equipment such as sheds, hoods, ducts, fans, dampers, etc. used to collect particulate matter generated by an affected facility at a grain elevator.

(j) *Grain unloading station* means that portion of a grain elevator where the grain is transferred from a truck, railcar, barge, or ship to a receiving hopper.

(k) *Grain loading station* means that portion of a grain elevator where the grain is transferred from the elevator to a truck, railcar, barge, or ship.

(l) *Grain handling operations* include bucket elevators or legs (excluding legs used to unload barges or ships), scale hoppers and surge bins (garners), turn heads, scalpers, cleaners, trippers, and the headhouse and other such structures.

(m) *Column dryer* means any equipment used to reduce the moisture content of grain in which the grain flows from the top to the bottom in one or more continuous packed columns between two perforated metal sheets.

(n) *Rack dryer* means any equipment used to reduce the moisture content of grain in which the grain flows from the top to the bottom in a cascading flow around rows of baffles (racks).

(o) *Unloading leg* means a device which includes a bucket-type elevator which is used to remove grain from a barge or ship.

[43 FR 34347, Aug. 3, 1978, as amended at 65 FR 61759, Oct. 17, 2000]

§ 60.302 Standard for particulate matter.

(a) On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any gases which exhibit greater than 0 percent opacity from any:

(1) Column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch).

(2) Rack dryer in which exhaust gases pass through a screen filter coarser than 50 mesh.

(b) On and after the date on which the performance test required to be conducted by §60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:

(1) Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf).

(2) Exhibits greater than 0 percent opacity.

(c) On and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from:

(1) Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.

(2) Any grain handling operation which exhibits greater than 0 percent opacity.

- (3) Any truck loading station which exhibits greater than 10 percent opacity.
- (4) Any barge or ship loading station which exhibits greater than 20 percent opacity.
- (d) The owner or operator of any barge or ship unloading station shall operate as follows:
 - (1) The unloading leg shall be enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device shall be maintained on both sides of the leg and the grain receiving hopper.
 - (2) The total rate of air ventilated shall be at least 32.1 actual cubic meters per cubic meter of grain handling capacity (ca. 40 ft³/bu).
 - (3) Rather than meet the requirements of paragraphs (d)(1) and (2) of this section the owner or operator may use other methods of emission control if it is demonstrated to the Administrator's satisfaction that they would reduce emissions of particulate matter to the same level or less.

§ 60.303 Test methods and procedures.

- (a) In conducting the performance tests required in §60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b). Acceptable alternative methods and procedures are given in paragraph (c) of this section.
- (b) The owner or operator shall determine compliance with the particulate matter standards in §60.302 as follows:
 - (1) Method 5 shall be used to determine the particulate matter concentration and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 1.70 dscm (60 dscf). The probe and filter holder shall be operated without heaters.
 - (2) Method 2 shall be used to determine the ventilation volumetric flow rate.
 - (3) Method 9 and the procedures in §60.11 shall be used to determine opacity.
- (c) The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:
 - (1) For Method 5, Method 17 may be used.

[54 FR 6674, Feb. 14, 1989]

§ 60.304 Modifications.

- (a) The factor 6.5 shall be used in place of "annual asset guidelines repair allowance percentage," to determine whether a capital expenditure as defined by §60.2 has been made to an existing facility.
- (b) The following physical changes or changes in the method of operation shall not by themselves be considered a modification of any existing facility:
 - (1) The addition of gravity loadout spouts to existing grain storage or grain transfer bins.

- (2) The installation of automatic grain weighing scales.
- (3) Replacement of motor and drive units driving existing grain handling equipment.
- (4) The installation of permanent storage capacity with no increase in hourly grain handling capacity.

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

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

Source Background and Description

Source Name:	ADM Milling Company
Source Location:	854 Bethel Ave., Beech Grove, IN 46107-0610
County:	Marion
SIC Code:	2041
Operation Permit No.:	F097-25351-00016
Operation Permit Issuance Date:	August 27, 2008
Significant Permit Revision No.:	F097-32098-00016
Permit Reviewer:	Deena Patton

On September 18, 2012, the Office of Air Quality (OAQ) had a notice published in Indianapolis Star, Indianapolis, Indiana, stating that ADM Milling Company had applied for a Significant Permit Revision to their FESOP to modify their existing stationary grain elevator and flour and milled wheat process facility. The notice also stated that the OAQ proposed to issue a significant permit revision for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On September 19, 2012, Dennis B. Buckley, Mayor of Beech Grove, submitted comments to IDEM, OAQ on the draft Significant Permit Revision.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Mayor Buckley wrote in support of ADM Milling expansion and asked that the significant permit revision be approved.

Response to Comment 1:

IDEM OAQ acknowledges the comment expressing support for the issuance of the permit. No changes were made as a result of this comment.

IDEM Contact

- (a) Questions regarding this proposed FESOP Significant Permit Revision can be directed to Deena Patton 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) 234-5400 or toll free at 1-800-451-6027 extension 4-5400.

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

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

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

Source Description and Location
--

Source Name:	ADM Milling Company
Source Location:	854 Bethel Ave., Beech Grove, IN 46107-0610
County:	Marion
SIC Code:	2041 (Flour and Other Grain Mill Products)
Operation Permit No.:	F097-25351-00016
Operation Permit Issuance Date:	August 27, 2008
Significant Permit Revision No.:	097-32098-00016
Permit Reviewer:	Deena Patton

On July 09, 2012, the Office of Air Quality (OAQ) received an application from ADM Milling Company related to a modification to an existing stationary grain elevator and a flour and milled wheat process facility.

Existing Approvals

The source was issued FESOP Renewal No. 097-25351-00016 on August 27, 2008. The source has since received the following approvals:

- (a) Administrative Amendment No. 097-28480-00016, issued on October 7, 2009; and
- (b) Administrative Amendment No. 097-30256-00016, issued on May 2, 2011.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is no designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion county, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .	

- (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. Marion 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_{2.5}**
 Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Marion 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

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, however, there is an applicable New Source Performance Standard that was in effect on August 7, 1980, therefore fugitive emissions, from the affected facility to which the New Source Performance Standard is applicable, are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Note: This facility falls within the “listed source category” for the New Source Performance Standard (NSPS) for Grain Elevators (40 CFR 60, Subpart DD), which was promulgated on or before August 7, 1980. This grain elevator has a permanent storage capacity of more than 2.5 million bushels.

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 ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
ES-1 Grain Receiving	6.80	6.80	ND	0.0	0.0	0.0	0.0	ND	0.0	0.0
ES-2 Grain Loadout	3.17	3.17	ND	0.0	0.0	0.0	0.0	ND	0.0	0.0
ES-3 Grain Storage	13.63	13.63	ND	0.0	0.0	0.0	0.0	ND	0.0	0.0
ES-4 Cleaning House	8.45	8.45	ND	0.0	0.0	0.0	0.0	ND	0.0	0.0
ES-5 Mill House	21.96	21.96	ND	0.0	0.0	0.0	0.0	ND	0.0	0.0
ES-6 Product Loadout	4.86	4.86	ND	0.0	0.0	0.0	0.0	ND	0.0	0.0

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
ES-7 Feed Loadout	3.45	3.45	ND	0.0	0.0	0.0	0.0	ND	0.0	0.0
Insignificant Activities Boiler #1	0.04	0.17	ND	0.01	2.19	0.12	1.84	ND	0.04	0.04 (Hexane)
Insignificant Activity Boiler #2	0.04	0.17	ND	0.01	2.19	0.12	1.84	ND	0.04	0.04 (Hexane)
Insignificant Activity Boiler #3	0.03	0.11	ND	0.01	1.45	0.08	1.21	ND	0.03	0.03 (Hexane)
Insignificant Activity Degreaser	0.0	0.0	ND	0.0	0.0	0.48	0.0	ND	0.0	0.0
Fugitive Emissions	17.15	17.15	ND	0.0	0.0	0.0	0.0	ND	0.0	0.0
Total PTE of Entire Source	94.27	94.27	ND	0.03	5.83	0.80	4.89	ND	0.11	0.11 (Hexane)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA
ND = not determined These emissions are based upon F097-30256-00016. **The 100,000 CO ₂ 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 stationary source under Emission Offset (326 IAC 2-3), because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) 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 ADM Milling Company on July 9, 2012, relating to the modification of the cleaning house (ES4), mill house (ES5), bulk plant and product loadout (ES6), and mill feed storage, handling, and loadout (ES7). As part of the modification, the source will be constructing new equipment, increasing the maximum capacities, and installing several new baghouses throughout the facility.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Unlimited PTE of the Entire Source (Before Revision)	14956	7327	ND	0.03	5.83	0.80	4.89	ND	0.11	0.04 (Hexane)
Unlimited PTE of the Entire Source (After Revision)	25148	12410	12035	0.03	5.83	0.80	4.89	7033	0.11	0.04 (Hexane)
Total Unlimited PTE of Proposed Revision	10192	5083	12035	0.0	0.0	0.0	0.0	7033	0.0	0.0

negl. = negligible

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 an increase in the maximum capacity of the facility and the construction of new emission units with unlimited 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 (*reflecting adjustment of existing limits*), with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
ES-1 Grain Receiving	6.80	6.80	6.80	0.0	0.0	0.0	0.0	0.0	0.0	0.0
ES-2 Grain Loadout	3.17	3.17	3.17	0.0	0.0	0.0	0.0	0.0	0.0	0.0
ES-3 Grain Storage	13.63	13.63	13.63	0.0	0.0	0.0	0.0	0.0	0.0	0.0
ES-4 Cleaning House	8.45 10.36	8.45 10.36	10.36	0.0	0.0	0.0	0.0	0.0	0.0	0.0
ES-5 Mill House	21.96 28.53	21.96 28.53	28.53	0.0	0.0	0.0	0.0	0.0	0.0	0.0
ES-6 Product Loadout	4.86 8.77	4.86 8.77	8.77	0.0	0.0	0.0	0.0	0.0	0.0	0.0
ES-7 Feed Loadout	3.45 4.06	3.45 4.06	4.06	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Insignificant Activities Boiler #1	0.04	0.17	0.17	0.01	2.19	0.12	1.84	2644	0.04	0.04 (Hexane)
Insignificant Activities Boiler #2	0.04	0.17	0.17	0.01	2.19	0.12	1.84	2644	0.04	0.04 (Hexane)
Insignificant Activities Boiler #3	0.03	0.11	0.11	0.01	1.45	0.08	1.21	1745	0.03	0.03 (Hexane)

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Degreaser	0.0	0.0	0.0	0.0	0.0	0.48	0.0	0.0	0.0	0.0
Fugitive Emissions	47.15 23.65	47.15 6.48	1.10	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total PTE of Entire Source	94.27 99.07	94.27 82.24	76.86	0.03	5.83	0.80	4.89	7033	0.11	0.11 (Hexane)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	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 CO₂e 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.

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 ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
ES-1 Grain Receiving	6.80	6.80	6.80	0.0	0.0	0.0	0.0	0.0	0.0	0.0
ES-2 Grain Loadout	3.17	3.17	3.17	0.0	0.0	0.0	0.0	0.0	0.0	0.0
ES-3 Grain Storage	13.63	13.63	13.63	0.0	0.0	0.0	0.0	0.0	0.0	0.0
ES-4 Cleaning House	10.36	10.36	10.36	0.0	0.0	0.0	0.0	0.0	0.0	0.0
ES-5 Mill House	28.53	28.53	28.53	0.0	0.0	0.0	0.0	0.0	0.0	0.0
ES-6 Product Loadout	8.77	8.77	8.77	0.0	0.0	0.0	0.0	0.0	0.0	0.0
ES-7 Feed Loadout	4.06	4.06	4.06	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Insignificant Activities Boiler #1	0.04	0.17	0.17	0.01	2.19	0.12	1.84	2644	0.04	0.04 (Hexane)

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Insignificant Activities Boiler #2	0.04	0.17	0.17	0.01	2.19	0.12	1.84	2644	0.04	0.04 (Hexane)
Insignificant Activities Boiler #3	0.03	0.11	0.11	0.01	1.45	0.08	1.21	1745	0.03	0.03 (Hexane)
Degreaser	0.0	0.0	0.0	0.0	0.0	0.48	0.0	0.0	0.0	0.0
Fugitive Emissions	23.65	6.48	1.10	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total PTE of Entire Source	99.07	82.24	76.86	0.03	5.83	0.80	4.89	7033	0.11	0.11 (Hexane)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	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 ₂ 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, PSD, and Nonattainment NSR 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.

This modification to an existing minor stationary source under 326 IAC 2-1.1-5 (Nonattainment New Source Review) will not change the minor status, because the potential to emit of PM2.5 from the entire source will be limited to be less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the source shall comply with the following:

- (1) PM, PM10, and PM2.5 emissions from the truck receiving baghouse CD1, truck loadout baghouse CD2, and grain storage and handling baghouses CD3, CD4 and CD5, shall each not exceed 0.01 grain/dscf.
- (2) All grain receiving and loadout operations shall be conducted such that fugitive emissions are controlled by the three-sided enclosure.
- (3) The throughput of grain received (ES1) shall be limited to 1,164,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (4) The throughput of grain loaded out (ES2) shall be limited to 400,000 tons of grain per twelve (12) consecutive month period with compliance determined at the end of each month.
- (5) PM, PM10, and PM2.5 emissions from the cleaning house, identified as ES4, and controlled by eight (8) baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, CD12, and CD38 shall each not exceed 0.005 grain/dscf.
- (6) PM, PM10, and PM2.5 emissions from the mill house, identified as ES5, and controlled by eighteen (18) baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, CD24, CD37, CD39, CD40, CD41, CD42, and CD43, shall each not exceed 0.005 grain/dscf.
- (7) PM, PM10, and PM2.5 emissions from the bulk plant and product loadout, identified as ES6, and controlled ten (10) baghouses, identified as CD25, CD28, CD29, CD30, CD31, CD44, CD45, CD46, CD47, and CD48, shall each not exceed 0.005 grain/dscf.
- (8) PM, PM10, and PM2.5 emissions from the mill feed storage and handling, identified as ES7, and controlled by seven (7) baghouses, identified as CD32, CD33, CD34, CD35, CD36, CD49, and CD50, shall each not exceed 0.01 grain/dscf.
- (9) All mill feed loadout operations shall be conducted such that fugitive emissions are controlled by a three-sided enclosure.
- (10) The throughput of mill feed loaded out shall be limited to 249,600 tons 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, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide PM emissions to less than 250 tons per twelve (12) consecutive month period, PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (PSD), and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) This source is subject to the New Source Performance Standards for Grain Elevators (40 CFR 60, Subpart DD), because this facility began operation in 1992 and has a total grain storage capacity of 5,835,000 bushels.

The operations subject to this rule include the following:

- (a) Cleaning house, identified as ES4, constructed in 1192, approved for modification in 2012, with a maximum capacity of 78 tons/hr, using eight (8) baghouses, identified as

CD6, CD7, CD8, CD9, CD10, CD11, CD12, CD38, as control, and exhausting to stacks S6, S7, S8, S9, S10, S11, S12, and S38, respectively.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

Applicable portions of the NSPS are the following:

- (1) 40 CFR 60.300
- (2) 40 CFR 60.301
- (3) 40 CFR 60.302
- (4) 40 CFR 60.303
- (5) 40 CFR 60.304

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the Cleaning House, ES4, except as otherwise specified in 40 CFR 60, Subpart DD.

- (b) There are no other 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)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63.11619, Subpart DDDDDDD (7D), are not included for this proposed revision, since this source does not own or operate a prepared feeds manufacturing facility that uses materials containing chromium or a materials containing manganese.
- (d) 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)

- (e) 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:

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.

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.

326 IAC 2-1.1-5 (Nonattainment New Source Review)

This modification to an existing minor stationary source under 326 IAC 2-1.1-5 (Nonattainment New Source Review) will not change the minor status, because the potential to emit of PM_{2.5} from the entire source will continue to be less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

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 modified units 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.

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.

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:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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.

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

The source is not subject to the requirements of 326 IAC 6-5, because this source has potential fugitive particulate emissions less than 25 tons per year.

Grain Operation

326 IAC 6-3 (Particulate emission limitations)

Pursuant to 326 IAC 6-3-1(c), this rule does not apply if a particulate matter limitation established in 326 IAC 6.5 is more stringent than the particulate limitations established in 326 IAC 6-3-2. The limitation of 0.03 grains/dscf established by 326 IAC 6.5-1-2(d) for this source is more stringent than the limitations established by 326 IAC 6-3 (see Appendix A). Therefore, the limitations established by this rule shall not apply.

326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)

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

Pursuant to 326 IAC 6.5-1-2(d), the following shall apply to the grain receiving area, identified as emission unit ES1, the grain loadout area, identified as emission unit ES2, and the grain storage and handling areas, identified as emission unit ES3, as follows:

- (a) For any grain storage elevator located at any grain processing source that has a permanent grain storage capacity of thirty-five thousand two hundred (35,200) cubic meters (one million (1,000,000) U.S. bushels) or more shall be limited to particulate matter emissions of no greater than seven-hundredths (0.07) g/dscm (three hundredths (0.03) grain per dscf).
- (b) All grain elevators subject to this article shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:
 - (1) Housekeeping practices shall be conducted as follows:
 - (a) Areas to be swept and maintained shall include, at a minimum, the following:
 - (i) General grounds, yard, and other open areas.
 - (ii) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
 - (iii) Grain driers with respect to accumulated particulate matter.
 - (b) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (c) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (d) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
 - (2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (a) Malfunctions.
 - (b) Breakdowns.
 - (c) Improper adjustment.
 - (d) Operating above the rated or designed capacity.
 - (e) Not following designed operating specifications.
 - (f) Lack of good preventive maintenance care.
 - (g) Lack of critical and proper spare replacement parts on hand.
 - (h) Lack of properly trained and experienced personnel.
 - (3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

Pursuant to 326 IAC 6.5-1-2(a), particulate (PM) emissions from the mill house (identified as ES5), the bulk plant and product loadout (identified as ES6), and mill feed storage, handling and loadout (identified as ES7) shall not exceed three hundredths (0.03) grains per dry standard cubic foot of exhaust air.

Compliance Determination, Monitoring and Testing Requirements

The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
ES4 - Baghouses CD38	Visible Emission Notations	Daily	Normal Abnormal	Response Steps
	Baghouse Pressure Drop		1 to 8 inches	
ES5 - Baghouses CD39-CD43	Visible Emission Notations	Daily	Normal Abnormal	Response Steps
	Baghouse Pressure Drop		1 to 8 inches	
ES6 - Baghouses CD44-CD48	Visible Emission Notations	Daily	Normal Abnormal	Response Steps
	Baghouse Pressure Drop		1 to 8 inches	
ES7 - Baghouses CD49 and CD50	Visible Emission Notations	Daily	Normal Abnormal	Response Steps
	Baghouse Pressure Drop		1 to 8 inches	

Proposed Changes

The following changes listed below are due to the proposed revision.

1. The emission unit descriptions have been revised in Sections A.2, D.1, D.2, and E.1 of the permit have been revised to indicate that the processes have been modified and to include several new baghouses.

IDEM, OAQ has decided to make additional revisions to the permit as described below.

2. IDEM has revised Section C - Overall Source Limit to include an overall source limit for greenhouse gases (GHGs).
3. IDEM, OAQ has revised Section B - Preventive Maintenance Plan to clarify the applicable rule citations.
4. IDEM, OAQ has revised Section B - Operational Flexibility to update the applicable rule citations. On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule citations listed in the permit. These changes are not changes to the underlining provisions, but only changes to the site of these rules.
5. IDEM has revised Section C - General Record Keeping Requirements to clarify the Permittee's responsibility with regards to record keeping.
6. IDEM has revised Section C - General Reporting Requirements and the Quarterly Deviation and Compliance Monitoring Report form to clarify the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

7. IDEM, OAQ, has decided to revise Conditions D.1.1, D.1.7, D.1.10, D.2.2, D.2.6, and D.2.9 to provide clarification.

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

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:

...

- (d) Cleaning house, identified as emission unit ES4, constructed in 1992, **approved for modification in 2012**, with a maximum capacity of ~~45~~ **78** tons/hr. The wheat cleaning house is controlled by ~~seven~~ **eight (78)** baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, ~~and CD12~~ **and CD38**, and exhausting to stacks S6, S7, S8, S9, S10, S11 ~~and S12~~ **and S38**, respectively.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

- (e) Mill house, identified as emission unit ES5, constructed in 1992, approved for modification in 2014~~2~~, with a maximum capacity of ~~45-78~~ tons/hr. The mill house consists of skimmers, stream blenders, purifiers, rollstands, stock hoppers, pinmills, and hammermills. The mill house is controlled by ~~thirteen~~ **eighteen (138)** baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, CD24, ~~and CD37~~, **CD39, CD40, CD41, CD42, and CD43**, exhausting to stacks S13, S14, S15, S16, S17, S18, S19, S20, S21, S22, S23, S24, ~~and S36~~, **S39, S40, and S41**, respectively. **CD42 and CD43 exhaust indoors.**

- (f) Bulk plant and product loadout, identified as emission unit ES6, constructed in 1992, **approved for modification in 2012**, with a maximum capacity of ~~32~~ **200** tons/hr. The flour bulk plant includes a bagging operation, loadout bins, sifters, and scales, with an enclosed loadout area for bulk shipment via trucks and railcars. Bulk plant and product loadout is controlled by ~~five~~ **ten (510)** baghouses, identified as CD25, ~~CD26~~ **CD28**, CD29, CD30, ~~and CD31~~, **CD44, CD45, CD46, CD47, and CD48**, and exhausting to stacks S25, S26, S29, S30 ~~and S31~~, **S42, S43, and S44**, respectively. **CD44 and CD45 exhaust indoors.**

- (g) Mill feed storage, handling and loadout, identified as emission unit ES7, constructed in 1992, **approved for modification in 2012**, with a maximum capacity of 120 tons/hr, and consisting of screening bins, feed bins, conveying and loadout. The mill feed storage, handling and loadout is controlled by ~~five~~ **seven (57)** baghouses, identified as CD32, CD33, CD34, CD35, ~~and CD36~~, **CD49, and CD50**, and exhausting to stacks S32, S33, S34, S35 ~~and S36~~, **S45, and S46**, respectively.

...

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][~~326 IAC 2-8-5(a)(1)~~]

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

...

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (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)(1) and (c) through (d). 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)(2), (c)(4), and (d).

- (b) Emission Trades [326 IAC 2-8-15(b)(e)]
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)(e).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

...

C.1 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) and **greenhouse gases (GHGs)**, 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.
- (4) **The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO2 equivalent emissions (CO2e) per twelve (12) consecutive month period.**

...

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.

...

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

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

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

- (d) Cleaning house, identified as emission unit ES4, constructed in 1992, **approved for modification in 2012**, with a maximum capacity of 78 tons/hr. The wheat cleaning house is controlled by ~~seven~~ **eight (78)** baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, ~~and CD12~~ **and CD38**, and exhausting to stacks S6, S7, S8, S9, S10, S11 ~~and S12~~ **and S38**, respectively.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

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

...

D.1.1 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4, ~~the allowable PM/PM-10/PM-2.5 emissions shall be limited as follows~~ **and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the Permittee shall comply with the following:**

- (a) ~~The emission rate~~ **PM, PM10, and PM2.5 emissions** from the truck receiving baghouse CD1, truck loadout baghouse CD2, and grain storage and handling baghouses CD3, CD4 and CD5, shall each not exceed 0.01 grain/dscf.
- ...
- (c) The throughput of grain received (ES1) shall be limited to ~~4,746,000~~ **1,164,000** tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) The throughput of grain loaded out (ES2) shall be limited to ~~4,560,000~~ **400,000** tons of grain per twelve (12) consecutive month period with compliance determined at the end of each month.
- (e) ~~The emission rate~~ **PM, PM10, and PM2.5 emissions** from the cleaning house, identified as ES4, and controlled by ~~seven~~ **eight (78)** baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, ~~and CD12,~~ **and CD38** shall each not exceed 0.005 grain/dscf.

Compliance with the above limits, combined with the limits from D.2.1 and the potential emissions from all other units will limit source-wide PM **emissions to less than 250 tons per twelve (12) consecutive month period**, #PM-10 and #PM-2.5 emissions to less than 100 tons per twelve (12) consecutive month period, **each, and shall render** ~~Therefore the requirements of 326 IAC 2-7, 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) are not applicable.~~

...

D.1.4 Particulate Control

- (a) The baghouses (CD1 through **CD12 and CD38**) for PM, PM-10 and PM-2.5 control shall be in operation and control emissions from ES1, ES2, ES3 and ES4 at all times that these facilities are in operation.
- ...

D.1.7 Parametric Monitoring

The Permittee shall record the pressure drop across baghouse CD1 through 12, used in conjunction with ES1, ES2, ES3 and ES4, at least once per day when this process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, **the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between** ~~of 1.0 and 8.0 inches of water or a range established~~ **unless a different upper-bound or lower-bound value for this range is determined** during the latest stack test; ~~the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response ~~steps in accordance with Section C - Response to Excursions or Exceedances~~, shall be considered a deviation from this permit.

...

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1(c) and D.1.1(d) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to 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).**

...

Emissions Unit Description:

- (e) Mill house, identified as emission unit ES5, constructed in 1992, approved for modification in 2014~~2~~, with a maximum capacity of ~~45-78~~ tons/hr. The mill house consists of skimmers, stream blenders, purifiers, rollstands, stock hoppers, pinmills, and hammermills. The mill house is controlled by ~~thirteen~~ **eighteen (138)** baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, CD24, ~~and~~ CD37, **CD39, CD40, CD41, CD42, and CD43**, exhausting to stacks S13, S14, S15, S16, S17, S18, S19, S20, S21, S22, S23, S24, ~~and~~ S36, **S39, S40, and S41**, respectively. **CD42 and CD43 exhaust indoors.**
- (f) Bulk plant and product loadout, identified as emission unit ES6, constructed in 1992, **approved for modification in 2012**, with a maximum capacity of ~~32~~ **200** tons/hr. The flour bulk plant includes a bagging operation, loadout bins, sifters, and scales, with an enclosed loadout area for bulk shipment via trucks and railcars. Bulk plant and product loadout is controlled by ~~five~~ **ten (510)** baghouses, identified as CD25, ~~CD26~~ **CD28**, CD29, CD30, ~~and~~ CD31, **CD44, CD45, CD46, CD47, and CD48**, and exhausting to stacks S25, S26, S29, S30 ~~and~~ S31, **S42, S43, and S44**, respectively. **CD44 and CD45 exhaust indoors.**
- (g) Mill feed storage, handling and loadout, identified as emission unit ES7, constructed in 1992, **approved for modification in 2012**, with a maximum capacity of 120 tons/hr, and consisting of screening bins, feed bins, conveying and loadout. The mill feed storage, handling and loadout is controlled by ~~five~~ **seven (57)** baghouses, identified as CD32, CD33, CD34, CD35, ~~and~~ CD36, **CD49, and CD50**, and exhausting to stacks S32, S33, S34, S35 ~~and~~ S36, **S45, and S46**, respectively.

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

...

D.2.2 FESOP Limits [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4, ~~the allowable PM/PM10/PM2.5 emissions shall be limited as follows and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the Permittee shall comply with the following:~~

- (a) ~~The emission rate~~ **PM, PM10, and PM2.5 emissions** from the mill house, identified as ES5, and controlled by ~~thirteen~~ **eighteen (138)** baghouses, identified as CD13, CD14, CD15, CD16, CD17, CD18, CD19, CD20, CD21, CD22, CD23, CD24, ~~and~~ CD37, **CD39, CD40, CD41, CD42, and CD43** shall each not exceed 0.005 grain/dscf.
- (b) ~~The emission rate~~ **PM, PM10, and PM2.5 emissions** from the bulk plant and product loadout, identified as ES6, and controlled ~~five~~ **ten (510)** baghouses, identified as CD25, ~~CD26~~ **CD28**, CD29, CD30, ~~and~~ CD31, **CD44, CD45, CD46, CD47, and CD48**, shall each not exceed 0.005 grain/dscf.
- (c) ~~The emission rate~~ **PM, PM10, and PM2.5 emissions** from the mill feed storage and handling, identified as ES7, and controlled by ~~four~~ **seven (47)** baghouses, identified as CD32, CD33, CD34, ~~and~~ CD35, **CD36, CD49, and CD50**, shall each not exceed 0.01 grain/dscf.
- (d) All mill feed loadout operations shall be conducted such that fugitive emissions are controlled by a three-sided enclosure.

- (e) The throughput of mill feed loaded out shall be limited to 249,9600 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits, combined with the limits from D.1.1 and the potential emissions from all other units will limit source-wide PM **emissions to less than 250 tons per twelve (12) consecutive month period**, #PM-10 and #PM-2.5 emissions to less than 100 tons per twelve (12) consecutive month period, **each, and shall render** ~~Therefore the requirements of 326 IAC 2-7, 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) are not applicable.~~

...
D.2.4 Particulate Control

- (a) The baghouses (CD13 through ~~CD37~~**CD25, CD28 through 37 and CD39 through CD50**) for PM, PM-10 and PM-2.5 control shall be in operation and control emissions from ES5, ES6 and ES7 at all times that these facilities are in operation.

...
D.2.6 Parametric Monitoring

The Permittee shall record the pressure drop across baghouses CD13 – **CD25 and CD28**-CD37, used in conjunction with ES5, ES6 and ES7, at least once per day when these processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, **the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 1.0 and 8.0 inches of water or a range established unless a different upper-bound or lower-bound value for this range is determined** during the latest stack test, ~~the Permittee shall take reasonable response steps.~~ Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

...
D.2.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.2.2(e) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to 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).**

SECTION E.1 FACILITY OPERATING CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- ...
(d) Cleaning house, identified as emission unit ES4, constructed in 1992, **approved for modification in 2012**, with a maximum capacity of **4578** tons/hr. The wheat cleaning house is controlled by ~~seven~~ **eight (78)** baghouses, identified as CD6, CD7, CD8, CD9, CD10, CD11, ~~and CD12~~ **and CD38**, and exhausting to stacks S6, S7, S8, S9, S10, S11 ~~and S12~~ **and S38**, respectively.

Under 40 CFR 60, Subpart DD, this is considered an affected facility.

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

E.1.2 Standards of Performance for Grain Elevators [40 CFR 60, Subpart DD] [326 IAC 12]

Pursuant to 40 CFR 60, Subpart DD, the Permittee shall comply with the provisions of Standards of Performance for Grain Elevators, which are incorporated by reference as 326 IAC 12, (included as Attachment ~~BA~~ of this permit) as specified as follows:

...

FESOP Quarterly Report:

Source Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107
FESOP Permit No.: F097-25351-00016
Facility: ES1 - Grain Receiving
Parameter: PM-10 / PM-2.5 emissions
Limit: The throughput of grain received is restricted to 1,716,164,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month

...

FESOP Quarterly Report:

Source Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107
FESOP Permit No.: F097-25351-00016
Facility: ES2 - Grain Loadout
Parameter: PM-10 / PM-2.5 emissions
Limit: The throughput of grain loaded out is restricted to 1,560,400,000 tons of grain per twelve (12) consecutive month period with compliance determined at the end of each month.

...

FESOP Quarterly Report:

Source Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana 46107
FESOP Permit No.: F097-25351-00016
Facility: ES7 - Mill feed loadout
Parameter: PM-10 / PM-2.5 emissions
Limit: The throughput of mill feed loaded out is restricted to 249,060 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

...

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 July 9, 2012.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. F097-32098-00016. 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 Deena Patton 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) 234-5400 or toll free at 1-800-451-6027 extension 4-5400.
- (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

**Appendix A: Emissions Calculations
Summary**

Company Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Significant Permit Revision No.: 097-32098-00016
Reviewer: Deena Patton

Process Name	Uncontrolled Potential Emissions (tons per year)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs/CO2e	Worst Individual HAP	Combined HAPs	
ES-1 Grain Receiving	591.30	193.82	32.85	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
ES-2 Grain Loadout	339.01	114.32	19.32	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
ES-3 Grain Storage	200.39	111.69	19.05	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
ES-4 Cleaning House	25.62	6.49	1.09	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
ES-5 Mill House	23914.80	11957.40	11,957.40	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
ES-6 Product Loadout	75.34	25.40	4.29	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
ES-7 Feed Loadout	1.73	0.42	0.42	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
Insignificant Activities											
Boiler #1 (5 MMBtu/hr)	0.04	0.17	0.17	0.01	2.19	0.12	1.84	2644	0.04	Hexane	0.04
Boiler #2 (5 MMBtu/hr)	0.04	0.17	0.17	0.01	2.19	0.12	1.84	2644	0.04	Hexane	0.04
Boiler #3 (3.3 MMBtu/hr)	0.03	0.11	0.11	0.01	1.45	0.08	1.21	1745	0.03	Hexane	0.03
Degreaser						0.48					
TOTAL	25148	12410	12035	0.03	5.83	0.80	4.89	7033	0.10	Hexane	0.11

Process Name	Controlled/Limited Potential Emissions (tons per year)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs/CO2e	Worst Individual HAP	Combined HAPs	
ES-1 Grain Receiving	6.80	6.80	6.80	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
ES-2 Grain Loadout	3.17	3.17	3.17	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
ES-3 Grain Storage	13.63	13.63	13.63	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
ES-4 Cleaning House	10.36	10.36	10.36	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
ES-5 Mill House	28.53	28.53	28.53	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
ES-6 Product Loadout	8.77	8.77	8.77	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
ES-7 Feed Loadout	4.06	4.06	4.06	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
Fugitives (uncaptured)	23.65	6.48	1.10	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0
Insignificant Activities											
Boiler #1 (5 MMBtu/hr)	0.04	0.17	0.17	0.01	2.19	0.12	1.84	2644	0.04	Hexane	0.04
Boiler #2 (5 MMBtu/hr)	0.04	0.17	0.17	0.01	2.19	0.12	1.84	2644	0.04	Hexane	0.04
Boiler #3 (3.3 MMBtu/hr)	0.03	0.11	0.11	0.01	1.45	0.08	1.21	1745	0.03	Hexane	0.03
Degreaser						0.48					
TOTAL	99.07	82.24	76.86	0.03	5.83	0.80	4.89	7033	0.10	Hexane	0.11

**Appendix A: Emissions Calculations
PM & PM10 Emmissions
Unlimited PTE**

Company Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Significant Permit Revision No.: 097-32098-00016
Reviewer: Deena Patton

Unit ID	Process Description	Throughput (tons/hr)	Emission Factor (lbs/ton)			Emissions (tons/yr)		
			PM	PM10	PM2.5	PM	PM10	PM2.5
ES-1	Grain Receiving	750	0.18	0.059	0.010	591.3	193.8	32.85
ES-2	Grain Loadout	900	0.086	0.029	0.0049	339.0	114.3	19.32
ES-3	Grain Storage & Handling [Total Storage = 5,835,000 bushels]	750	0.061	0.034	0.0058	200.4	111.7	19.05
ES-4	Cleaning House	78	0.075	0.019	0.0032	25.6	6.5	1.09
ES-5	Mill House*	78	70	35	35	23915	11957	11957
ES-6	Bulk Plant & Product Loadout	200	0.086	0.029	0.0049	75.3	25.4	4.29
ES-7	Mill feed storage, handling and loadout*	120	0.0033	0.0008	0.0008	1.73	0.42	0.42
Totals						25148	12410	12034

Methodology

Emission Factors are from AP 42, Chapter 9.9.1

*PM2.5 emissions assumed equal to PM10 emissions.

PM/PM10/PM2.5 Emissions (tons/yr) = Throughput (tons/hr) x Emission Factor (lb/ton) * 8760 hr/yr / 2000 lb/ton

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Boiler #1**

Company Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Significant Permit Revision No.: 097-32098-00016
Reviewer: Deena Patton

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
5.0	1000	43.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.04	0.17	0.17	0.01	2.19	0.12	1.84

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 2 for HAPs emissions calculations.

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

Company Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Significant Permit Revision No.: 097-32098-00016
Reviewer: Deena Patton

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.6E-05	2.6E-05	1.6E-03	3.9E-02	7.4E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.1E-05	2.4E-05	3.1E-05	8.3E-06	4.6E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See Page 3 for Greenhouse Gas calculations.

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

Company Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Significant Permit Revision No.: 097-32098-00016
Reviewer: Deena Patton

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	2,628	0.05	0.05
Summed Potential Emissions in tons/yr	2,628		
CO2e Total in tons/yr	2,644		

Methodology

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

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

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

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

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Boiler #2**

Company Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Significant Permit Revision No.: 097-32098-00016
Reviewer: Deena Patton

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
5.0	1000	43.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.04	0.17	0.17	0.01	2.19	0.12	1.84

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

Methodology

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

See page 2 for HAPs emissions calculations.

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

Company Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Significant Permit Revision No.: 097-32098-00016
Reviewer: Deena Patton

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.6E-05	2.6E-05	1.6E-03	3.9E-02	7.4E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.1E-05	2.4E-05	3.1E-05	8.3E-06	4.6E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See Page 3 for Greenhouse Gas calculations.

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

Company Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Significant Permit Revision No.: 097-32098-00016
Reviewer: Deena Patton

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	2,628	0.05	0.05
Summed Potential Emissions in tons/yr	2,628		
CO2e Total in tons/yr	2,644		

Methodology

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

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

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

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

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Boiler #3**

Company Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Significant Permit Revision No.: 097-32098-00016
Reviewer: Deena Patton

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
3.3	1000	28.9

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.03	0.11	0.11	0.01	1.45	0.08	1.21

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 2 for HAPs emissions calculations.

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

Company Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Significant Permit Revision No.: 097-32098-00016
Reviewer: Deena Patton

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.0E-05	1.7E-05	1.1E-03	2.6E-02	4.9E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.2E-06	1.6E-05	2.0E-05	5.5E-06	3.0E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See Page 3 for Greenhouse Gas calculations.

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

Company Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Significant Permit Revision No.: 097-32098-00016
Reviewer: Deena Patton

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	1,734	0.03	0.03
Summed Potential Emissions in tons/yr	1,735		
CO2e Total in tons/yr	1,745		

Methodology

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

**Appendix A: Emissions Calculations
Limited PM10 Emmissions**

Company Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Significant Permit Revision No.: 097-32098-00016
Reviewer: Deena Patton

Point Source Emissions							
Emitting Unit	Control Device ID	Limited Concentration	Flow Rate	Operating Hours	Limited PM/PM10/PM2.5 Emissions		Total Limited PM/PM10/PM2.5 Emissions per Emitting Unit (tons/yr)
		gr/dscf	dscfm	hr/yr	lbs/hr	tons/yr	
ES1 - Grain Receiving (truck)	CD1	0.01	18100	8760	1.55	6.80	6.80
ES2 - Grain Loadout	CD2	0.01	8447	8760	0.72	3.17	3.17
ES3 - Grain Storage and handling	CD3	0.01	12100	8760	1.04	4.54	13.63
	CD4	0.01	17000	8760	1.46	6.38	
	CD5	0.01	7200	8760	0.62	2.70	
	CD6	0.005	5625	8760	0.24	1.06	
ES4 - Cleaning House	CD7	0.005	5625	8760	0.24	1.06	10.36
	CD8	0.005	7500	8760	0.32	1.41	
	CD9	0.005	7500	8760	0.32	1.41	
	CD10	0.005	7500	8760	0.32	1.41	
	CD11	0.005	5625	8760	0.24	1.06	
	CD12	0.005	5625	8760	0.24	1.06	
	CD38	0.005	10186	8760	0.44	1.91	
	CD13	0.005	15876	8760	0.68	2.98	
ES5 - Mill House	CD14	0.005	4536	8760	0.19	0.85	28.53
	CD15	0.005	4536	8760	0.19	0.85	
	CD16	0.005	13608	8760	0.58	2.55	
	CD17	0.005	15694	8760	0.67	2.95	
	CD18	0.005	12604	8760	0.54	2.37	
	CD19	0.005	17014	8760	0.73	3.19	
	CD20	0.005	4253	8760	0.18	0.80	
	CD21	0.005	4253	8760	0.18	0.80	
	CD22	0.005	4253	8760	0.18	0.80	
	CD23	0.005	8507	8760	0.36	1.60	
	CD24	0.005	3864	8760	0.17	0.73	
	CD37	0.005	8000	8760	0.34	1.50	
	CD39	0.005	11095	8760	0.48	2.08	
	CD40	0.005	11095	8760	0.48	2.08	
	CD41	0.005	12272	8760	0.53	2.30	
	CD42	0.005	269	8760	0.01	0.05	
	CD43	0.005	269	8760	0.01	0.05	
ES6 - Bulk Plant and Product Loadout	CD25	0.005	22250	8760	0.95	4.18	8.77
	CD28	0.005	9100	8760	0.39	1.71	
	CD29	0.005	893	8760	0.038	0.17	
	CD30	0.005	893	8760	0.038	0.17	
	CD31	0.005	664	8760	0.028	0.12	
	CD44	0.005	611	8760	0.026	0.11	
	CD45	0.005	611	8760	0.026	0.11	
	CD46	0.005	1527	8760	0.065	0.29	
	CD47	0.005	7771	8760	0.333	1.46	
	CD48	0.005	2375	8760	0.102	0.45	
ES7 - Feed Storage, Handling, and Loadout	CD32	0.01	1600	8760	0.14	0.60	4.06
	CD33	0.01	2000	8760	0.17	0.75	
	CD34	0.01	5200	8760	0.45	1.95	
	CD35	0.01	400	8760	0.03	0.15	
	CD36	0.005	1200	8760	0.05	0.23	
	CD49	0.005	1681	8760	0.07	0.32	
	CD50	0.005	343	8760	0.01	0.06	

Methodology

Emissions (lb/hr) = concentration gr/dscf * Flowrate (dscfm) * 7000 gr/lb * 60 min/hr
Emission (tons/yr) = Emissions (lb/hr) x Hours of Operation (hrs/yr) / 2000 lb/ton

Fugitive (Uncaptured) Emissions					Emissions Factor (lbs/ton) ^(b)			Fugitive Emissions (tons/yr)		
Emission Unit ID	Emissions Unit Description	Control Device	Control Efficiency	Throughput Cap (tons/yr)	PM	PM10	PM2.5	PM	PM10	PM2.5
ES1 (Fug1)	Railcar Grain Receiving	3-sided enclosure	60.00%	1164000	0.032	0.0078	0.0013	7.45	1.82	0.30
ES2 (Fug2)	Truck Grain Loadout	3-sided enclosure	60.00%	400000	0.086	0.029	0.0049	6.88	2.32	0.39
ES3 (Fug3)	Elevator Bin Vents*	sealed shut	36.50%	1164000	0.025	0.0063	0.0011	9.24	2.33	0.41
ES7 (Fug5)	Feed Loadout Fugitives	3-sided enclosure ^(a)	96.00%	249600	0.016	0.004	0.00055	0.08	0.02	0.003
Totals								23.65	6.48	1.10

Methodology

^(a) 90% of emissions are captured by aspiration; 60% of uncaptured emissions are controlled by a three sided enclosure.
^(b) Emissions Factors are from AP-42, a dustiness ratio of 2.5
Fugitive Emissions (tons/yr) = Emission Factor (lb/ton) * Throughput (tons/yr) * (1 - control efficiency) / 2000 lb/ton
*ADM Milling has 126 wheat bins, 46 of these bins are sealed shut and emit no fugitive dust, thus 46/126-0.365*100=36.5% control efficiency.

Total Source Limited Potential to Emit Summary

Emissions Unit ID	Point Source Emissions		Fugitive Emissions		Point Source Emissions		Fugitive Emissions	
	PM tons/yr	PM tons/yr	PM10 tons/yr	PM10 tons/yr	PM2.5 tons/yr	PM2.5 tons/yr	PM2.5 tons/yr	PM2.5 tons/yr
ES1 ^(a)	6.80	7.45	6.80	1.82	6.80	0.30		
ES2 ^(b)	3.17	6.88	3.17	2.32	3.17	0.39		
ES3	13.63	9.24	13.63	2.33	13.63	0.41		
ES4	10.36	0.00	10.36	0.00	10.36	0.00		
ES5	28.53	0.00	28.53	0.00	28.53	0.00		
ES6	8.77	0.00	8.77	0.00	8.77	0.00		
ES7	4.06	0.08	4.06	0.02	4.06	0.003		
Total Emissions		98.96		81.79		76.41		

^(a) assume worst case all grain is received by railcar
^(b) assume worst case all gain loadout is by truck

**Appendix A: Emissions Calculations
PM Limitations Comparison
326 IAC 6-3-2 and 326 IAC 6.5-1**

Company Name: ADM Milling Company
Source Address: 854 Bethel Avenue, Beech Grove, Indiana, 46107
Significant Permit Revision No.: 097-32098-00016
Reviewer: Deena Patton

Point Source Emissions							
Emitting Unit	Control Device ID	326 IAC 6.5-1 Concentration Limit	Flow Rate	Limited PM Emissions (326 IAC 6.5-1)	Total PM Emissions (326 IAC 6.5-1) by Emissions Unit	Maximum Process Weight Rate	PM Limitation (326 IAC 6-3-2) by Emissions Unit
		gr/dscf	dscfm	lbs/hr	lbs/hr	tons/hr	lbs/hr
ES1 - Grain Receiving (truck)	CD1	0.03	18100	4.65	4.65	750	73.93
ES2 - Grain Loadout	CD2	0.03	8447	2.17	2.17	900	76.23
ES3 - Grain Storage and handling	CD3	0.03	12100	3.11	9.33	750	73.93
	CD4	0.03	17000	4.37			
	CD5	0.03	7200	1.85			
ES4 - Cleaning House	CD6	0.03	5625	1.45	14.19	78	48.82
	CD7	0.03	5625	1.45			
	CD8	0.03	7500	1.93			
	CD9	0.03	7500	1.93			
	CD10	0.03	7500	1.93			
	CD11	0.03	5625	1.45			
	CD12	0.03	5625	1.45			
	CD38	0.03	10186	2.62			
ES5 - Mill House	CD13	0.03	15876	4.08	39.09	78	48.82
	CD14	0.03	4536	1.17			
	CD15	0.03	4536	1.17			
	CD16	0.03	13608	3.50			
	CD17	0.03	15694	4.04			
	CD18	0.03	12604	3.24			
	CD19	0.03	17014	4.38			
	CD20	0.03	4253	1.09			
	CD21	0.03	4253	1.09			
	CD22	0.03	4253	1.09			
	CD23	0.03	8507	2.19			
	CD24	0.03	3864	0.99			
	CD37	0.03	8000	2.06			
	CD39	0.03	11095	2.85			
	CD40	0.03	11095	2.85			
	CD41	0.03	12275	3.16			
CD42	0.03	269	0.07				
CD43	0.03	269	0.07				
ES6 - Bulk Plant and Product Loadout	CD25	0.03	22250	5.72	12.01	200	58.51
	CD28	0.03	9100	2.34			
	CD29	0.03	893	0.230			
	CD30	0.03	893	0.230			
	CD31	0.03	664	0.171			
	CD44	0.03	611	0.157			
	CD45	0.03	611	0.157			
	CD46	0.03	1527	0.393			
	CD47	0.03	7771	1.998			
	CD48	0.03	2375	0.611			
ES7 - Feed Storage, Handling, and Loadout	CD32	0.03	1600	0.41	3.19	120	53.13
	CD33	0.03	2000	0.51			
	CD34	0.03	5200	1.34			
	CD35	0.03	400	0.10			
	CD36	0.03	1200	0.31			
	CD49	0.03	1681	0.43			
	CD50	0.03	343	0.09			



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Joe Whitis
ADM Milling Company
PO Box 610
Beech Grove, IN 46107

DATE: October 23, 2012

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

SUBJECT: Final Decision
FESOP - Significant Permit Revision
097 - 32098 - 00016

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:
Andrew Soukup, Plant Mgr
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

October 23, 2012

TO: Beech Grove Public Library

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

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

Applicant Name: ADM Milling Company
Permit Number: 097 - 32098 - 00016

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	LPOGOST 10/23/2012 ADM Milling Company 097 - 32098 - 00016 final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Joe Whitis ADM Milling Company PO Box 610 Beech Grove IN 46107 (Source CAATS) Via confirmed delivery										
2		Andrew Soukup Plant Mgr ADM Milling Company PO Box 610 Beech Grove IN 46107 (RO CAATS)										
3		Beech Grove Public Library 1102 N Main St Beech Grove IN 46107-1595 (Library)										
4		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
5		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
6		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
7		Beech Grove City Council and Mayors Office 806 Main St. Beech Grove IN 46107 (Local Official)										
8		Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 (Local Official)										
9		Dennis Buckley City of Beech Grove 806 Main St. Beech Grove IN 46107 (Affected Party)										
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