



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
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: April 3, 2013

RE: ADM Grain Company / 163-32652-00042

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

**Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY**

**ADM Grain Company
2350 Broadway Avenue
Evansville, Indiana 47712**

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

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.: F163-32652-00042	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 3, 2013 Expiration Date: April 3, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary country grain elevator that handles grain and byproducts.

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

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

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

- (a) Two (2) truck receiving pits, identified as Pit #1 and #2, constructed in 1988 and 1949, respectively, each with a maximum receiving throughput of 600 tons per hour of grain (20,000 bushels per hour at 60 pounds per bushel), exhausting to baghouse #2 for particulate control. Pit #1 and Pit #2 are also capable of receiving byproducts.
- (b) One (1) truck receiving pit, identified as Pit #3, constructed in 1949, with a maximum receiving throughput of 360 tons per hour of grain (12,000 bushels per hour at 60 pounds per bushel), exhausting to baghouse #2 for particulate control. Pit #3 is also capable of receiving byproducts.
- (c) One (1) rail receiving pit, identified as EP-05A, constructed in 1990, with a maximum receiving throughput of 660 tons per hour of grain (22,000 bushels per hour at 60 pounds per bushel). The rail receiving pit is also capable of receiving byproducts.

Note: A maximum of 400,000 tons per year of byproducts are received by truck or railcar and dumped into one of the truck receiving pits or the rail receiving pit. These products generally proceed directly to truck, rail or barge loadout; however, periodically, the byproducts are temporarily stored on site.

- (d) One (1) enclosed internal grain handling operation, constructed between 1949 and 2001, consisting of the following equipment, and using baghouses (#1 and #2) and exhausting to stacks (#1 and #2) for particulate control:
 - (1) Seven (7) bucket elevators associated with fully enclosed conveyor belts or drags, identified as EP-08, with a maximum throughput of 720 tons per hour (24,000 bushels per hour at 60 pounds per bushel).

- (e) One (1) enclosed grain cleaner, identified as EP-07, constructed in 1989, with a maximum throughput of 300 tons of grain per hour (10,000 bushels per hour at 60 pounds per bushel), equipped with enclosures for particulate control.
- (f) One (1) natural gas column grain dryer, identified as EP-06, constructed in 1996, with a 31.6 MMBtu/hour burner, with a maximum throughput of 90 tons of grain per hour (3,000 bushels per hour at 60 pounds per bushel), equipped with a perforation plate for particulate control.
- (g) Two (2) truck load-out areas, identified as EP-03, constructed in 1949, with a maximum throughput of 300 tons per hour of grain (10,000 bushels of grain per hour at 60 pounds per bushel), and exhausting to baghouse #2 for particulate control. The truck load-out areas are also capable of loading out byproducts.
- (h) Four (4) truck load-out spouts, identified as EP-3A(701), EP-3B(702), EP-3C(13), and EP-3D(dust tank), approved for construction in 2009, each with a maximum throughput of 499.2 tons per hour of grain (16,640 bushels of grain per hour at 60 pounds per bushel), using attached sleeves for particulate control. The truck load-out spouts are also capable of loading out byproducts.
- (i) One (1) rail load-out, identified as EP-05, constructed in 1990, with a maximum throughput of 660 tons per hour of grain (22,000 bushels of grain per hour at 60 pounds per bushel), using a load-out sock for particulate control. The rail load-out area is also capable of loading out byproducts.
- (j) One (1) barge load-out, identified as EP-04, constructed in 1979, with a maximum throughput of 1080 tons per hour of grain (36,000 bushels of grain per hour at 60 pounds per bushel), exhausting to baghouse #1 for particulate control and a 14,500 cubic foot per minute (CFM) booster fan, installed in 2009, attached to the existing dust collection system near the midpoint of the barge load out bridge tower for improved dust collection. The barge load-out area is also capable of loading out byproducts.

Note: A maximum of 400,000 tons per year of byproducts are received by truck or railcar and dumped into one of the truck receiving pits or the rail receiving pit. These products generally proceed directly to truck, rail or barge loadout; however, periodically, the byproducts are temporarily stored on site.

- (k) Three (3) storage bins, identified as bins #2, #3, and #4, each with a maximum capacity of 450.54 tons (15,018 bushels of grain at 60 pounds per bushel).
- (l) Two (2) storage bins, identified as bins #5 and #10, each with a maximum capacity of 112.17 tons (3,739 bushels of grain at 60 pounds per bushel).
- (m) Four (4) storage bins, identified as bins #6, #7, #8, and #9, each with a maximum capacity of 136.23 tons (4,541 bushels of grain at 60 pounds per bushel).
- (n) Two (2) storage bins, identified as bins #11 and #12, each with a maximum capacity of 57.3 tons (1,910 bushels of grain at 60 pounds per bushel).
- (o) One (1) storage bin, identified as bin #13, with a maximum capacity of 82.5 tons (2,750 bushels of grain at 60 pounds per bushel).
- (p) Ten (10) storage bins, identified as bins #100, #101, #102, #103, #104, #300, #301, #302, #303, and #304, each with a maximum capacity of 499.02 tons (16,634 bushels of grain at 60 pounds per bushel).

- (q) Two (2) storage bins, identified as bins #200 and #205, each with a maximum capacity of 154.08 tons (5,136 bushels of grain at 60 pounds per bushel).
- (r) Four (4) storage bins, identified as bins #201, #202, #203, and #204, each with a maximum capacity of 392.55 tons (13,085 bushels of grain at 60 pounds per bushel).
- (s) One (1) storage bin, identified as bin #500, with a maximum capacity of 641.49 tons (21,383 bushels of grain at 60 pounds per bushel).
- (t) Two (2) storage bins, identified as bins #501 and #701, each with a maximum capacity of 650.25 tons (21,675 bushels of grain at 60 pounds per bushel).
- (u) Eight (8) storage bins, identified as bins #502, #503, #504, #505, #702, #703, #704, and #705, each with a maximum capacity of 659.79 tons (21,993 bushels of grain at 60 pounds per bushel).
- (v) Three (3) storage bins, identified as bins #600, #601, and #602, each with a maximum capacity of 429.69 tons (14,323 bushels of grain at 60 pounds per bushel).
- (w) Two (2) storage bins, identified as bins #603 and #604, each with a maximum capacity of 434.76 tons (14,492 bushels of grain at 60 pounds per bushel).
- (x) One (1) storage bin, identified as bin #605, with a maximum capacity of 202.35 tons (6,745 bushels of grain at 60 pounds per bushel).
- (y) One (1) storage bin, identified as bin #700, with a maximum capacity of 658.2 tons (21,940 bushels of grain at 60 pounds per bushel).
- (z) Two (2) storage bins, identified as bins #801 and #802, each with a maximum capacity of 4380 tons (146,000 bushels of grain at 60 pounds per bushel).
- (aa) One (1) storage bin, identified as bin #1 that is used to weigh product only.

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

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

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

SECTION B GENERAL CONDITIONS

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

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, F163-32652-00042, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than 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) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

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

The Permittee shall implement the PMPs.

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

B.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, or Southwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

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

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

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

- (a) All terms and conditions of permits established prior to F163-32652-00042 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.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 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.16 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.17 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.18 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.19 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.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 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.22 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.23 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.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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) 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 two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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.4 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.5 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.6 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.7 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.8 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.9 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.10 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.11 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.12 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.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

no later than ninety (90) days after the date of issuance of this permit.

The ERP 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) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

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

C.14 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.15 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.16 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.17 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.18 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) truck receiving pits, identified as Pit #1 and #2, constructed in 1988 and 1949, respectively, each with a maximum receiving throughput of 600 tons per hour of grain (20,000 bushels per hour at 60 pounds per bushel), exhausting to baghouse #2 for particulate control. Pit #1 and Pit #2 are also capable of receiving byproducts.
- (b) One (1) truck receiving pit, identified as Pit #3, constructed in 1949, with a maximum receiving throughput of 360 tons per hour of grain (12,000 bushels per hour at 60 pounds per bushel), exhausting to baghouse #2 for particulate control. Pit #3 is also capable of receiving byproducts.
- (c) One (1) rail receiving pit, identified as EP-05A, constructed in 1990, with a maximum receiving throughput of 660 tons per hour of grain (22,000 bushels per hour at 60 pounds per bushel). The rail receiving pit is also capable of receiving byproducts.

Note: A maximum of 400,000 tons per year of byproducts are received by truck or railcar and dumped into one of the truck receiving pits or the rail receiving pit. These products generally proceed directly to truck, rail or barge loadout; however, periodically, the byproducts are temporarily stored on site.

- (d) One (1) enclosed internal grain handling operation, constructed between 1949 and 2001, consisting of the following equipment, and using baghouses (#1 and #2) and exhausting to stacks (#1 and #2) for particulate control:
 - (1) Seven (7) bucket elevators associated with fully enclosed conveyor belts or drags, identified as EP-08, with a maximum throughput of 720 tons per hour (24,000 bushels per hour at 60 pounds per bushel).
- (e) One (1) enclosed grain cleaner, identified as EP-07, constructed in 1989, with a maximum throughput of 300 tons of grain per hour (10,000 bushels per hour at 60 pounds per bushel), equipped with enclosures for particulate control.
- (f) One (1) natural gas column grain dryer, identified as EP-06, constructed in 1996, with a 31.6 MMBtu/hour burner, with a maximum throughput of 90 tons of grain per hour (3,000 bushels per hour at 60 pounds per bushel), equipped with a perforation plate for particulate control.
- (g) Two (2) truck load-out areas, identified as EP-03, constructed in 1949, with a maximum throughput of 300 tons per hour of grain (10,000 bushels of grain per hour at 60 pounds per bushel), and exhausting to baghouse #2 for particulate control. The truck load-out areas are also capable of loading out byproducts.
- (h) Four (4) truck load-out spouts, identified as EP-3A(701), EP-3B(702), EP-3C(13), and EP-3D(dust tank), approved for construction in 2009, each with a maximum throughput of 499.2 tons per hour of grain (16,640 bushels of grain per hour at 60 pounds per bushel), using attached sleeves for particulate control. The truck load-out spouts are also capable of loading out byproducts.
- (i) One (1) rail load-out, identified as EP-05, constructed in 1990, with a maximum throughput of 660 tons per hour of grain (22,000 bushels of grain per hour at 60 pounds per bushel), using a load-out sock for particulate control. The rail load-out area is also capable of loading out byproducts.

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

Note: A maximum of 400,000 tons per year of byproducts are received by truck or railcar and dumped into one of the truck receiving pits or the rail receiving pit. These products generally proceed directly to truck, rail or barge loadout; however, periodically, the byproducts are temporarily stored on site.

- (k) Three (3) storage bins, identified as bins #2, #3, and #4, each with a maximum capacity of 450.54 tons (15,018 bushels of grain at 60 pounds per bushel).
- (l) Two (2) storage bins, identified as bins #5 and #10, each with a maximum capacity of 112.17 tons (3,739 bushels of grain at 60 pounds per bushel).
- (m) Four (4) storage bins, identified as bins #6, #7, #8, and #9, each with a maximum capacity of 136.23 tons (4,541 bushels of grain at 60 pounds per bushel).
- (n) Two (2) storage bins, identified as bins #11 and #12, each with a maximum capacity of 57.3 tons (1,910 bushels of grain at 60 pounds per bushel).
- (o) One (1) storage bin, identified as bin #13, with a maximum capacity of 82.5 tons (2,750 bushels of grain at 60 pounds per bushel).
- (p) Ten (10) storage bins, identified as bins #100, #101, #102, #103, #104, #300, #301, #302, #303, and #304, each with a maximum capacity of 499.02 tons (16,634 bushels of grain at 60 pounds per bushel).
- (q) Two (2) storage bins, identified as bins #200 and #205, each with a maximum capacity of 154.08 tons (5,136 bushels of grain at 60 pounds per bushel).
- (r) Four (4) storage bins, identified as bins #201, #202, #203, and #204, each with a maximum capacity of 392.55 tons (13,085 bushels of grain at 60 pounds per bushel).
- (s) One (1) storage bin, identified as bin #500, with a maximum capacity of 641.49 tons (21,383 bushels of grain at 60 pounds per bushel).
- (t) Two (2) storage bins, identified as bins #501 and #701, each with a maximum capacity of 650.25 tons (21,675 bushels of grain at 60 pounds per bushel).
- (u) Eight (8) storage bins, identified as bins #502, #503, #504, #505, #702, #703, #704, and #705, each with a maximum capacity of 659.79 tons (21,993 bushels of grain at 60 pounds per bushel).
- (v) Three (3) storage bins, identified as bins #600, #601, and #602, each with a maximum capacity of 429.69 tons (14,323 bushels of grain at 60 pounds per bushel).
- (w) Two (2) storage bins, identified as bins #603 and #604, each with a maximum capacity of 434.76 tons (14,492 bushels of grain at 60 pounds per bushel).

- (x) One (1) storage bin, identified as bin #605, with a maximum capacity of 202.35 tons (6,745 bushels of grain at 60 pounds per bushel).
 - (y) One (1) storage bin, identified as bin #700, with a maximum capacity of 658.2 tons (21,940 bushels of grain at 60 pounds per bushel).
 - (z) Two (2) storage bins, identified as bins #801 and #802, each with a maximum capacity of 4380 tons (146,000 bushels of grain at 60 pounds per bushel).
 - (aa) One (1) storage bin, identified as bin #1 that is used to weigh product only.
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

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

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

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

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

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

- (1) Housekeeping practices shall be conducted as follows:
 - (A) Areas to be swept and maintained shall include, at a minimum, the following:
 - (i) General grounds, yard, and other open areas.

- (ii) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
- (iii) Grain driers with respect to accumulated particulate matter.
- (B) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
- (C) Dust from driveways, access roads, and other areas of travel shall be controlled.
- (D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
- (2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (A) Malfunctions.
 - (B) Breakdowns.
 - (C) Improper adjustment.
 - (D) Operating above the rated or designed capacity.
 - (E) Not following designed operating specifications.
 - (F) Lack of good preventive maintenance care.
 - (G) Lack of critical and proper spare replacement parts on hand.
 - (H) Lack of properly trained and experienced personnel.
- (3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

D.1.2 PM10 Emission Limitations [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8 (FESOP) and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable:

- (a) The grain elevator throughput at the Truck Receiving Pits #1, #2 and #3 and Rail Receiving Pit EP-05A shall be less than 19,350,000 bushels per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) PM10 emissions before control shall not exceed the following emission limitations:

Unit Description	PM10 Emission Limit (lbs/ton)
Truck Receiving Pits #1, #2 and #3	0.059
Rail Receiving Pit EP-05A	0.0078
Internal Handling and Grain Cleaning Operations	0.034
Load out (Truck/Railcar/Barge)	0.029

Compliance with these limits, combined with the potential to emit PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, total HAPs to less than twenty-five (25) tons per 12 consecutive month period, greenhouse gases (GHGs) to less than 100,000 tons of CO₂ equivalent (CO₂e) emissions per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2

(Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset), 326 IAC 2-1.1-5 (Nonattainment New Source Review), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

D.1.3 PSD Minor Limitations [326 IAC 2-2]

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

- (a) The grain elevator throughput at the Truck Receiving Pits #1, #2 and #3 and Rail Receiving Pit EP-05A shall be less than 19,350,000 bushels per twelve (12) consecutive month period, with compliance determined at the end of each month;
- (b) PM emissions before control shall not exceed the following emission limitations:

Unit Description	PM Emission Limit (lbs/ton)
Truck Receiving Pits #1, #2 and #3	0.18
Rail Receiving Pit EP-05A	0.032
Internal Handling and Grain Cleaning Operations	0.061
Load out (Truck/Railcar/Barge)	0.086

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

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.5 Particulate Control

- (a) In order to comply with Condition D.1.1, the enclosures and baghouses associated with the emission units in Condition D.1.1 shall be in operation and control particulate emissions from the respective emission units at all times the emission units are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.6 Visible Emissions Notations

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

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

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.2(a) and Condition D.1.3(a), the Permittee shall maintain records of the total grain elevator throughput received at the Truck Receiving Pits #1, #2 and #3 and Rail Receiving Pit EP-05A each month and each compliance period.
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the stack exhausts from baghouse #1 and baghouse #2. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.8 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.2(a) and D.1.3(a) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: ADM Grain Company
Source Address: 2350 Broadway Avenue, Evansville, Indiana 47712
FESOP Permit No.: F163-32652-00042

**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 Grain Company
Source Address: 2350 Broadway Avenue, Evansville, Indiana 47712
FESOP Permit No.: F163-32652-00042

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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 Grain Company
Source Address: 2350 Broadway Avenue, Evansville, Indiana 47712
FESOP Permit No.: F163-32652-00042
Facility: Grain elevator
Parameter: Grain elevator throughput
Limit: The grain elevator throughput at the Truck Receiving Pits #1, #2 and #3 and Rail Receiving Pit EP-05A shall be less than 19,350,000 bushels per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 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 Grain Company
 Source Address: 2350 Broadway Avenue, Evansville, Indiana 47712
 FESOP Permit No.: F163-32652-00042

Months: _____ **to** _____ **Year:** _____

<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**

Technical Support Document (TSD) for a
Minor Source Operating Permit (MSOP) Transitioning to a Federally Enforceable State
Operating Permit (FESOP)

Source Description and Location

Source Name: ADM Grain Company
Source Location: 2350 Broadway Avenue Evansville IN 47712
County: Vanderburgh
SIC Code: 5153 (Grain and Field Beans) and 4491 (Marine Cargo Handling)
Permit No.: F163-32652-00042
Permit Reviewer: Susann Brown

On December 18, 2012, the Office of Air Quality (OAQ) received an application from ADM Grain Company related to the transition of an MSOP to a FESOP.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP Notice Only Change No. 163-27136-00042, issued on December 11, 2008;
- (b) MSOP Notice Only Change No. 163-27399-00042, issued on February 2, 2009;
- (c) MSOP Minor Permit Revision No. 163-28381-00042, issued on October 2, 2009;
- (d) MSOP Notice Only Change No. 163-28688-00042, issued on December 21, 2009; and
- (e) MSOP Renewal No. 163-31595-00042, issued October 17, 2012.

Due to this application, the source is transitioning from a MSOP to a FESOP.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

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

Unclassifiable or attainment effective October 27, 2011, for PM_{2.5}.

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

Fugitive Emissions

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

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

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by ADM Grain Company, on December 18, 2012, relating to an expanded definition of byproducts, an increased throughput for byproducts and the addition of truck shipping of byproducts to the permit. Byproducts include grain byproducts, such as corn gluten pellets, dried distillers grain and solubles (DDGS), soybean meal, and non-grain byproducts, such as coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, dirt, iron carbide, petroleum coke, magnetite, aluminum ingots, pig iron, paper products, scrap steel, and steel coils.

This facility receives grain, grain byproducts, and non-grain byproducts, which are either directly shipped or temporarily stored in bins and subsequently shipped by rail, barge or truck. There is no processing of these grains or byproducts at this facility. There is no permanent storage of byproducts at this facility.

This source has a MSOP permit and is transitioning to a FESOP permit.

The source consists of the following permitted emission units:

- (a) Two (2) truck receiving pits, identified as Pit #1 and #2, constructed in 1988 and 1949, respectively, each with a maximum receiving throughput of 600 tons per hour of grain (20,000 bushels per hour at 60 pounds per bushel), exhausting to baghouse #2 for particulate control. Pit #1 and Pit #2 are also capable of receiving byproducts.
- (b) One (1) truck receiving pit, identified as Pit #3, constructed in 1949, with a maximum receiving throughput of 360 tons per hour of grain (12,000 bushels per hour at 60 pounds per bushel), exhausting to baghouse #2 for particulate control. Pit #3 is also capable of receiving byproducts.
- (c) One (1) rail receiving pit, identified as EP-05A, constructed in 1990, with a maximum receiving throughput of 660 tons per hour of grain (22,000 bushels per hour at 60 pounds per bushel). The rail receiving pit is also capable of receiving byproducts.

Note: A maximum of 400,000 tons per year of byproducts are received by truck or railcar and dumped into one of the truck receiving pits or the rail receiving pit. These products generally proceed directly to truck, rail or barge loadout; however, periodically, the byproducts are temporarily stored on site.

- (d) One (1) enclosed internal grain handling operation, constructed between 1949 and 2001, consisting of the following equipment, and using baghouses (#1 and #2) and exhausting to stacks (#1 and #2) for particulate control:
 - (1) Seven (7) bucket elevators associated with fully enclosed conveyor belts or drags, identified as EP-08, with a maximum throughput of 720 tons per hour (24,000 bushels per hour at 60 pounds per bushel).
- (e) One (1) enclosed grain cleaner, identified as EP-07, constructed in 1989, with a maximum throughput of 300 tons of grain per hour (10,000 bushels per hour at 60 pounds per bushel), equipped with enclosures for particulate control.
- (f) One (1) natural gas column grain dryer, identified as EP-06, constructed in 1996, with a 31.6 MMBtu/hour burner, with a maximum throughput of 90 tons of grain per hour (3,000 bushels per hour at 60 pounds per bushel), equipped with a perforation plate for particulate control.
- (g) Two (2) truck load-out areas, identified as EP-03, constructed in 1949, with a maximum throughput of 300 tons per hour of grain (10,000 bushels of grain per hour at 60 pounds per bushel), and exhausting to baghouse #2 for particulate control. The truck load-out areas are also capable of loading out byproducts.
- (h) Four (4) truck load-out spouts, identified as EP-3A(701), EP-3B(702), EP-3C(13), and EP-3D(dust tank), approved for construction in 2009, each with a maximum throughput of 499.2 tons per hour of grain (16,640 bushels of grain per hour at 60 pounds per bushel), using attached sleeves for particulate control. The truck load-out spouts are also capable of loading out byproducts.
- (i) One (1) rail load-out, identified as EP-05, constructed in 1990, with a maximum throughput of 660 tons per hour of grain (22,000 bushels of grain per hour at 60 pounds per bushel), using a load-out sock for particulate control. The rail load-out area is also capable of loading out byproducts.
- (j) One (1) barge load-out, identified as EP-04, constructed in 1979, with a maximum throughput of 1080 tons per hour of grain (36,000 bushels of grain per hour at 60 pounds

per bushel), exhausting to baghouse #1 for particulate control and a 14,500 cubic foot per minute (CFM) booster fan, installed in 2009, attached to the existing dust collection system near the midpoint of the barge load out bridge tower for improved dust collection. The barge load-out area is also capable of loading out byproducts.

Note: A maximum of 400,000 tons per year of byproducts are received by truck or railcar and dumped into one of the truck receiving pits or the rail receiving pit. These products generally proceed directly to truck, rail or barge loadout; however, periodically, the byproducts are temporarily stored on site.

- (k) Three (3) storage bins, identified as bins #2, #3, and #4, each with a maximum capacity of 450.54 tons (15,018 bushels of grain at 60 pounds per bushel).
- (l) Two (2) storage bins, identified as bins #5 and #10, each with a maximum capacity of 112.17 tons (3,739 bushels of grain at 60 pounds per bushel).
- (m) Four (4) storage bins, identified as bins #6, #7, #8, and #9, each with a maximum capacity of 136.23 tons (4,541 bushels of grain at 60 pounds per bushel).
- (n) Two (2) storage bins, identified as bins #11 and #12, each with a maximum capacity of 57.3 tons (1,910 bushels of grain at 60 pounds per bushel).
- (o) One (1) storage bin, identified as bin #13, with a maximum capacity of 82.5 tons (2,750 bushels of grain at 60 pounds per bushel).
- (p) Ten (10) storage bins, identified as bins #100, #101, #102, #103, #104, #300, #301, #302, #303, and #304, each with a maximum capacity of 499.02 tons (16,634 bushels of grain at 60 pounds per bushel).
- (q) Two (2) storage bins, identified as bins #200 and #205, each with a maximum capacity of 154.08 tons (5,136 bushels of grain at 60 pounds per bushel).
- (r) Four (4) storage bins, identified as bins #201, #202, #203, and #204, each with a maximum capacity of 392.55 tons (13,085 bushels of grain at 60 pounds per bushel).
- (s) One (1) storage bin, identified as bin #500, with a maximum capacity of 641.49 tons (21,383 bushels of grain at 60 pounds per bushel).
- (t) Two (2) storage bins, identified as bins #501 and #701, each with a maximum capacity of 650.25 tons (21,675 bushels of grain at 60 pounds per bushel).
- (u) Eight (8) storage bins, identified as bins #502, #503, #504, #505, #702, #703, #704, and #705, each with a maximum capacity of 659.79 tons (21,993 bushels of grain at 60 pounds per bushel).
- (v) Three (3) storage bins, identified as bins #600, #601, and #602, each with a maximum capacity of 429.69 tons (14,323 bushels of grain at 60 pounds per bushel).
- (w) Two (2) storage bins, identified as bins #603 and #604, each with a maximum capacity of 434.76 tons (14,492 bushels of grain at 60 pounds per bushel).
- (x) One (1) storage bin, identified as bin #605, with a maximum capacity of 202.35 tons (6,745 bushels of grain at 60 pounds per bushel).
- (y) One (1) storage bin, identified as bin #700, with a maximum capacity of 658.2 tons (21,940 bushels of grain at 60 pounds per bushel).

- (z) Two (2) storage bins, identified as bins #801 and #802, each with a maximum capacity of 4380 tons (146,000 bushels of grain at 60 pounds per bushel).
- (aa) One (1) storage bin, identified as bin #1 that is used to weigh product only.
- (bb) Paved roads, identified as EP-09. [326 IAC 6-4]

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination - FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential to Emit (tons/year)
PM	288.80
PM10*	102.03
PM2.5	18.21
SO2	0.08
NOx	13.57
VOC	0.75
CO	11.40
GHGs as CO2e	16,382
Worst Single HAP	0.24 (hexane)
Total HAPs	0.26

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

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM10 is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year.

PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, 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 FESOP (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs****	Total HAPs	Worst Single HAP
Non-Fugitive Emissions***										
Grain Elevator (grain receiving, handling, storage, and shipping)	183.73	63.07	10.74	—	—	—	—	—	—	—
Byproducts (receiving, handling, and shipping)	65.40	24.40	4.14	—	—	—	—	—	—	—
Natural Gas Dryer	0.26	1.03	1.03	0.08	13.57	0.75	11.40	16,382	0.26	0.24 (hexane)
Total PTE (Non-Fugitive Emissions)***	249.39	88.50	15.91	0.08	13.57	0.75	11.40	16,382	0.26	0.24 (hexane)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA
Fugitive Emissions***										
Paved Roads***	20.96	4.19	1.03	—	—	—	—	—	—	—
Total PTE (Fugitive Emissions)***	20.96	4.19	1.03	—	—	—	—	—	—	—
Total PTE of Entire Source (Non-Fugitive and Fugitive)***	270.35	92.70	16.94	0.08	13.57	0.75	11.40	16,382	0.26	0.24 (hexane)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	NA	NA	NA

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

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

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

****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.

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

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

- (1) The grain elevator throughput at the Truck Receiving Pits #1, #2 and #3 and Rail Receiving Pit EP-05A shall be less than 19,350,000 bushels per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (2) PM10 emissions before control shall not exceed the following emission limitations:

Unit Description	PM10 Emission Limit (lbs/ton)
Truck Receiving Pits #1, #2 and #3	0.059
Rail Receiving Pit EP-05A	0.0078
Internal Handling and Grain Cleaning Operations	0.034
Load out (Truck/Railcar/Barge)	0.029

Compliance with these limits, combined with the potential to emit PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, total HAPs to less than twenty-five (25) tons per 12 consecutive month period, greenhouse gases (GHGs) to less than 100,000 tons of CO₂ equivalent (CO₂e) emissions per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset), 326 IAC 2-1.1-5 (Nonattainment New Source Review), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

(b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM is limited to less than 250 tons per year, the potential to emit all other attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject-to-regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

- (1) The grain elevator throughput at the Truck Receiving Pits #1, #2 and #3 and Rail Receiving Pit EP-05A shall be less than 19,350,000 bushels per twelve (12) consecutive month period, with compliance determined at the end of each month;

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

Unit Description	PM Emission Limit (lbs/ton)
Truck Receiving Pits #1, #2 and #3	0.18
Rail Receiving Pit EP-05A	0.032
Internal Handling and Grain Cleaning Operations	0.061
Load out (Truck/Railcar/Barge)	0.086

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

Note: The above throughput and PM and PM10 limitations are intended to limit the PM and PM10 emissions before control and do not take into account PM and PM10 control provided by the baghouses (#1 and #2), or the sleeves or enclosures on the internal handling equipment.

Federal Rule Applicability

New Source Performance Standards (NSPS)

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

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

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (63.7480 through 63.7575) (326 IAC 20-95) are not included in the permit renewal, because this source is not a major source of HAPs.
- (d) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (63.11193 through 63.11237), are not included in the permit renewal, because the source does not contain boilers. This source has a natural gas fired grain dryer.

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDD are not included in the permit, since this source is not considered a prepared feeds manufacturing facility as defined by 40 CFR 63.11627. This source does not manufacture animal feed. This source consists of a stationary country grain elevator that handles grain and byproducts.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
- (g) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

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

326 IAC 2-3 (Emission Offset)

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

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

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

326 IAC 6.8 (PM Limitations for Lake County)

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

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)
 See Federal Rule Applicability Section of this TSD

State Rule Applicability – Individual Facilities

Grain Elevator

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

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

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

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

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

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

- (1) Housekeeping practices shall be conducted as follows:
- (A) Areas to be swept and maintained shall include, at a minimum, the following:
 - (i) General grounds, yard, and other open areas.
 - (ii) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
 - (iii) Grain driers with respect to accumulated particulate matter.

- (B) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (C) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
- (2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
- (A) Malfunctions.
 - (B) Breakdowns.
 - (C) Improper adjustment.
 - (D) Operating above the rated or designed capacity.
 - (E) Not following designed operating specifications.
 - (F) Lack of good preventive maintenance care.
 - (G) Lack of critical and proper spare replacement parts on hand.
 - (H) Lack of properly trained and experienced personnel.
- (3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

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

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

Byproducts Operations

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

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

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

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

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

Natural Gas-Fired Dryer (natural gas combustion)

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

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

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the natural gas-fired grain dryer is not subject to the requirements of 326 IAC 7-1.1, since it has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

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

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

Compliance Determination and Monitoring Requirements

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

Emission Units	Control	Parameter	Frequency	Range	Excursions and Exceedances
Truck Receiving Pits #1, #2 and #3	baghouse #2	Visible Emissions	Daily	Normal-Abnormal	Response Steps
Truck/Rail Load-out and Barge Load-out	socks sleeves baghouse #1 baghouse #2	Visible Emissions	Daily	Normal-Abnormal	Response Steps

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

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

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 December 18, 2012.

The operation of this source shall be subject to the conditions of the attached proposed FESOP No. 163-32652-00042. The staff recommends to the Commissioner that this FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Susann Brown at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5176 or toll free at 1-800-451-6027 extension 45176.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

TSD Appendix A: Emissions Calculations

Company Name: ADM Grain Company
Source Address: 2350 Broadway Ave Evansville, IN 47712
Permit Number: F163-32652-00042
Reviewer: Susann Brown
Date: December 20, 2012

Unlimited/Uncontrolled Potential to Emit (tons/year)*										
Process description	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Non-Fugitive Emissions**										
Grain Elevator (grain receiving, handling, storage and shipping)	223.14	76.60	13.04	-	-	-	-	-	-	-
Byproducts (receiving, handling, and shipping)	65.40	24.40	4.14	-	-	-	-	-	-	-
Natural Gas Dryer	0.26	1.03	1.03	0.08	13.57	0.75	11.40	16382	0.26	0.24 (hexane)
Total Non-Fugitive Emissions**	288.80	102.03	18.21	0.08	13.57	0.75	11.40	16382	0.26	0.24 (hexane)
Fugitive Emissions**										
Paved Roads***	20.96	4.19	1.03	-	-	-	-	-	-	-
Total Fugitive Emissions**	20.96	4.19	1.03	-	-	-	-	-	-	-
Total Non-Fugitive and Fugitive Emissions**	309.76	106.23	19.24	0.08	13.57	0.75	11.40	16382	0.26	0.24 (hexane)

Limited/Uncontrolled Potential to Emit (tons/year)*										
Process description	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Non-Fugitive Emissions**										
Grain Elevator (grain receiving, handling, storage and shipping)	183.73	63.07	10.74	-	-	-	-	-	-	-
Byproducts (receiving, handling, and shipping)	65.40	24.40	4.14	-	-	-	-	-	-	-
Natural Gas Dryer	0.26	1.03	1.03	0.08	13.57	0.75	11.40	16382	0.26	0.24 (hexane)
Total Non-Fugitive Emissions**	249.39	88.50	15.91	0.08	13.57	0.75	11.40	16382	0.26	0.24 (hexane)
Fugitive Emissions**										
Paved Roads***	20.96	4.19	1.03	-	-	-	-	-	-	-
Total Fugitive Emissions**	20.96	4.19	1.03	-	-	-	-	-	-	-
Total Non-Fugitive and Fugitive Emissions**	270.35	92.70	16.94	0.08	13.57	0.75	11.40	16382	0.26	0.24 (hexane)

Limited/Controlled Potential to Emit (tons/year)*										
Process description	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Non-Fugitive Emissions**										
Grain Elevator (grain receiving, handling, storage and shipping)	38.04	11.29	1.91	-	-	-	-	-	-	-
Byproducts (receiving, handling, and shipping)	6.54	2.44	0.41	-	-	-	-	-	-	-
Natural Gas Dryer	0.26	1.03	1.03	0.08	13.57	0.75	11.40	16382.39	0.26	0.24 (hexane)
Total Non-Fugitive Emissions**	44.83	14.76	3.36	0.08	13.57	0.75	11.40	16382	0.26	0.24 (hexane)
Fugitive Emissions**										
Paved Roads***	20.96	4.19	1.03	-	-	-	-	-	-	-
Total Fugitive Emissions**	20.96	4.19	1.03	-	-	-	-	-	-	-
Total Non-Fugitive and Fugitive Emissions**	65.80	18.96	4.39	0.08	13.57	0.75	11.40	16382	0.26	0.24 (hexane)

Notes

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

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

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

****Byproducts include grain byproducts, such as corn gluten pellets, dried distillers grain and solubles (DDGS), and soybean meal, and non-grain byproducts, such as coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, dirt, iron carbide, petroleum coke, magnetite, aluminum ingots, pig iron, paper products, scrap steel, and steel coils.

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

Company Name: ADM Grain Company
Source Address: 2350 Broadway Avenue, Evansville, IN 47712
Permit Number: F163-32652-00042
Reviewer: Susann Brown
Date: December 20, 2012

Bulk Density of Grain = lbs/bushel

1. Potential Annual Throughput Calculation

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

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

Total number of internal handling steps =
 Potential Internal Handling Throughput = tons/year

2. PTE Calculations

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

Methodology

For the potential to emit, IDEM has assumed all grain is received by straight truck or railcar, cleaned, dried, and shipped out by straight truck.

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03)

*Pursuant to AP42 Section 9.9.1.3 item (4), in cases where emissions from an internal cleaner are not controlled with a fabric filter or cyclone control device, the headhouse and internal operations emission factor accounts for any internal emissions from equipment within the structure that might escape to the atmosphere.

**Shipping by truck produces more particulate emissions than shipping by railcar or barge. To constitute realistic maximum particulate emissions IDEM has assumed all shipping is handled by truck.

Receiving - Straight Truck (tons/yr) = Maximum Throughput Truck Receiving Pits (bushels/hr) x 60 lbs/bushel x 1 ton/2000 lbs x 8760 hrs/yr

PTE of PM/PM10/PM2.5 Before Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs

PTE of PM/PM10/PM2.5 After Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs x (1- Control Efficiency (%))

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

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

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

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

Company Name: ADM Grain Company
Source Address: 2350 Broadway Avenue, Evansville, IN 47712
Permit Number: F163-32652-00042
Reviewer: Susann Brown
Date: December 20, 2012

Bulk Density of Grain = 60 lbs/bushel

1. Limited Annual Throughput Calculation

	(bushels/yr)	(tons/yr)
Annual Maximum Throughput	19,350,000	580,500

Total number of internal handling steps = 2
 Potential Internal Handling Throughput = 1,161,000 tons/year

2. Limited PTE Calculations

Emissions Unit Description	Maximum Grain Throughput (tons/yr)	Uncontrolled Emission Factors (lbs/ton)			Control Device(s)	Collection and Control Efficiency (%)	PTE Before Control (tons/yr)			PTE After Control (tons/yr)		
		PM	PM10	PM2.5			PM	PM10	PM2.5	PM	PM10	PM2.5
Receiving - Straight Truck	580,500	0.18	0.059	0.010	baghouse #2	90%	52.25	17.12	2.90	5.22	1.71	0.29
Receiving - Railcar	580,500	0.032	0.0078	0.001	none	0%	9.29	2.26	0.38	9.29	2.26	0.38
Receiving (worst case assumption)							52.25	17.12	2.90	9.29	2.26	0.38
Internal Handling and Grain Cleaning*	1,161,000	0.061	0.034	0.0058	enclosed and baghouse #1 and baghouse #2	90%	35.41	19.74	3.37	3.54	1.97	0.34
Drying - Column Dryer	580,500	0.22	0.055	0.0094	perforation plate	80%	63.86	15.96	2.73	12.77	3.19	0.55
Load out - (Truck/Railcar/Barge)**	580,500	0.086	0.029	0.0049	spouts and sleeves or socks or baghouse #1 or baghouse #2	80%	24.96	8.42	1.42	4.99	1.68	0.28
Storage - Silos and Bins	580,500	0.025	0.0063	0.0011	enclosed	90%	7.26	1.83	0.32	0.73	0.18	0.03
Totals							183.73	63.07	10.74	31.32	9.30	1.58

Methodology

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

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03)

*Pursuant to AP42 Section 9.9.1.3 item (4), in cases where emissions from an internal cleaner are not controlled with a fabric filter or cyclone control device, the headhouse and internal operations emission factor accounts for any internal emissions from equipment within the structure that might escape to the atmosphere.

**Shipping by truck produces more particulate emissions than shipping by railcar or barge. To constitute realistic maximum particulate emissions IDEM has assumed all shipping is handled by truck.

Receiving - Straight Truck (tons/yr) = Maximum Throughput Truck Receiving Pits (bushels/hr) x 60 lbs/bushel x 1 ton/2000 lbs x 8760 hrs/yr

PTE of PM/PM10/PM2.5 Before Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs

PTE of PM/PM10/PM2.5 After Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs x (1- Control Efficiency (%))

**TSD Appendix A: Emission Calculations
Byproducts Receiving, Handling, and Shipping**

Company Name: ADM Grain Company
Source Address: 2350 Broadway Avenue, Evansville, IN 47712
Permit No.: F163-32652-00042
Reviewer: Susann Brown
Date: December 20, 2012

	Maximum Throughput (tons/hr)	Maximum Annual Operating Hours (hours/yr)	Potential Throughput (tons/yr)
Total	45.7	8,760	400,000

Emissions Unit Description	Maximum Byproduct Throughput (tons/yr)	PM Emission Factor (lbs/ton)***	PM10 Emission Factor (lbs/ton)***	PM2.5 Emission Factor (lbs/ton)***	Control Device(s)	Collection and Control Efficiency (%)	Unlimited PTE of PM Before Control (tons/yr)	Unlimited PTE of PM10 Before Control (tons/yr)	Unlimited PTE of PM2.5 Before Control (tons/yr)	Unlimited PTE of PM After Control (tons/yr)	Unlimited PTE of PM10 After Control (tons/yr)	Unlimited PTE of PM2.5 After Control (tons/yr)
Receiving - Straight Truck or Railcar	400,000	0.18	0.059	0.010	baghouse #2	90%	36.00	11.80	2.00	3.60	1.18	0.20
Internal Handling and Grain Cleaning Operations	400,000	0.061	0.034	0.0058	enclosed and baghouse #1 and baghouse #2	90%	12.20	6.80	1.16	1.22	0.68	0.12
Loadout - Truck/Barge/Rail *	400,000	0.086	0.029	0.0049	baghouse #1	90%	17.20	5.80	0.98	1.72	0.58	0.10
Storage - Silos and Bins **	0	0.025	0.0063	0.0011	None	0%	0.00	0.00	0.00	0.00	0.00	0.00
Totals							65.40	24.40	4.14	6.54	2.44	0.41

Methodology

*Shipping by truck produces more particulate emissions than shipping by barge or rail. To constitute realistic maximum particulate emissions IDEM has assumed all shipping is handled by truck.

**The source will not be storing byproducts.

***Byproducts include grain biproducts, corn gluten pellets, dried distillers grain and solubles (DDGS), soybean meal, coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, dirt, iron carbide, petroleum coke, magnetite, aluminum ingots, pig iron, paper products, scrap steel, and steel coils.

Emission factors were assessed for sand, gravel, fertilizer, and grain. The emission factors used as alternative emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03).

Maximum Throughput (tons/yr) = Maximum byproducts available from supplier.

Unlimited PTE of PM/PM10/PM2.5 Before Control (tons/yr) = [Maximum Throughput (tons/yr)] * [Emission Factor (lbs/ton)] * [ton/2,000 lbs]

Unlimited PTE of PM/PM10/PM2.5 After Control (tons/yr) = [Unlimited PTE of PM/PM10/PM2.5 Before Control (tons/yr)] * [1 - Control Efficiency]

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

Limited PTE of PM/PM10/PM2.5 After Control (tons/yr) = [Limited PTE of PM/PM10/PM2.5 Before Control (tons/yr)] * [1 - Control Efficiency]

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

Company Name: ADM Grain Company
Source Address: 2350 Broadway Ave Evansville, IN 47712
Permit Number: F163-32652-00042
Reviewer: Susann Brown
Date: December 20, 2012

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

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

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

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

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

Methodology

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

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

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

Methodology

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

Abbreviations

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

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

Company Name: ADM Grain Company
Source Address: 2350 Broadway Avenue Evansville, IN 47712
Permit Number: F163-32652-00042
Reviewer: Susann Brown
Date: December 20, 2012

Paved Roads at Industrial Site

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

Type of Traffic	Vehicle Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Semi-truck (entering plant) (one-way trip)	semi-truck	166.0	1.0	166.0	40.0	6640.0	430	0.081	13.5	4934.4
Semi-truck (leaving plant) (one-way trip)	semi-truck	166.0	1.0	166.0	40.0	6640.0	637	0.121	20.0	7309.8
Total				332.0		13280.0			33.5	12244.2

Average Vehicle Weight Per Trip =

40.0	tons/trip
------	-----------

Average Miles Per Trip =

0.10	miles/trip
------	------------

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

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

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
where p =

125	days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
-----	---

N =

365	days per year
-----	---------------

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	3.745	0.749	0.1838	lb/mile
Mitigated Emission Factor, E_{ext} =	3.424	0.685	0.1681	lb/mile

Type of Traffic	Vehicle Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Semi-truck (entering plant) (one-way trip)	semi-truck	9.24	1.85	0.45	8.45	1.69	0.41
Semi-truck (leaving plant) (one-way trip)	semi-truck	13.69	2.74	0.67	12.52	2.50	0.61
		22.93	4.59	1.13	20.96	4.19	1.03

Methodology

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

Abbreviations

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

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

DATE: April 3, 2013

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

SUBJECT: Final Decision
FESOP
163-32652-00042

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

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

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

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
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: Evansville Vanderburgh Public Library

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

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

Applicant Name: ADM Grain Company
Permit Number: 163-32652-00042

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	DPABST 4/3/2013 ADM Grain Company 163-32652-00042 (Final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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2		Jeffrey J Becker VP - US Grain Ops & Engineering ADM Grain Company 4666 Faries Pkwy Decatur IL 62526 (RO CAATS)									
3		Evansville City Council and Mayors Office 1NW MLK Blvd, Rm 302 Evansville IN 47708 (Local Official)									
4		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 (Local Official)									
5		Evansville Vanderburg Public Library 200 SE Martin Luther King Jr. Blvd Evansville IN 47708-1694 (Library)									
6		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)									
7		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 (Health Department)									
8		Kim Sherman 3355 Woodview Drive Newburgh IN 47630 (Affected Party)									
9		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)									
10		Evansville EPA 100 E. Walnut St. Suite 100, Newsome Center Evansville IN 47713 (Local Official)									
11		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)									
12		Melinda Paul HSMF, LLC 12835 Saint Wendel Road Evansville IN 47720 (Affected Party)									
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