INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: August 21, 2013

RE: Gavillon Grain / 153-32926-00038

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.dot 6/13/13

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Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Gavilon Grain, LLC
7646 North County Road 125 East
Shelburn, Indiana 47879

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

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

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

Operation Permit No.: M153-32926-00038	
Issued by: Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 21, 2013 Expiration Date: August 21, 2023

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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary grain receiving, handling, drying, storage and shipping source.

Source Address:	7646 North County Road 125 East, Shelburn, Indiana 47879
General Source Phone Number:	812-397-5710
SIC Code:	5153 (Grain and Field Beans)
County Location:	Sullivan
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) enclosed grain receiving operation, identified as RECEIVING, constructed in 1972 and approved for modification in 2009, and consisting of the following:

(1) One (1) truck dump pit, identified as Pit #1 (P1), with a maximum capacity of 20,000 bushels per hour (600 tons/hr), equipped with a baffle for particulate control.

(2) One (1) truck dump pit, identified as Pit #2 (P2), with a maximum capacity of 20,000 bushels per hour (600 tons/hr), equipped with a baffle for particulate control.

(3) One (1) truck dump pit, identified as Pit #3 (P3), with a maximum capacity of 10,000 bushels per hour (300 tons/hr), with emissions exhausted to the atmosphere.

(b) One (1) column grain dryer, with a natural gas-fired, low emission cyclone burner, identified as DRYER1, constructed in 1998, with a plate perforation diameter of 0.07 inches, with a maximum heat input capacity of 41.96 MMBtu/hr and a maximum throughput rate of 4,700 bushels of grain per hour (140 tons/hr). The dryer is loaded by the Wet Leg (L6) & emptied by the Dry Leg (L7).

(c) One (1) internal handling operation, identified as Grain Conveying, with a maximum capacity of 54,700 bushels per hour (1,641 tons per hour), constructed between 1962 and 2010, consisting of bucket elevators (legs), drag conveyors, belt conveyors, distributors and augers, consisting of the following:

Emissions Unit Description	Year Constructed	Maximum (bushels/hr)
40,000 Belt Conveyor (B1)*	2006	40,000
B Bin South Bottom Drag Conveyor (D7)	2003	20,000
B Bin North Bottom Drag Conveyor (D6)	2003	20,000
East Pad Belt Conveyor (B2)*	2006	20,000
Leg 1 (L1)	2001	20,000
Pit Drag Conveyor 1 (D1)	2001	20,000
Pit Drag Conveyor 3 (D3)*	2007	10,000
Brock Drag Conveyor (D9)	1972	10,000
Brock Reclaim Conveyor (D16)	1987	10,000
Leg 2 (L2)	1972	20,000
Pit Drag Conveyor 2 (D2)	1972	20,000
Dry Leg (L7)	1998	8,000
Big Tank Belt Conveyor (B3)	1972	8,000
Big Tank Conveyor 1 (D15)	1990	8,000
Leg 3 (L3)	1972	10,000
Wet Leg (L6)	1998	6,000
NE Drag Conveyor (D13)	1972	6,000
SE Drag Conveyor (D12)	1972	6,000
NW Drag Conveyor (D11)	1972	6,000
SW Drag Conveyor (D10)	1972	6,000
B Bin Auger (A1)	1972	4,000
SW Pad Auger (A3)	1972	3,500
NW Pad Auger (A2)	1972	3,500
Bin 1 Reclaim Conveyor (D17)*	2009	7,500
Bin 2 Reclaim Conveyor (D18)*	2009	7,500
B-Bin Top Fill Drag Conveyor (D19)*	2008	30,000
Big Tank Conveyor 2 (D20)*	2010	10,000
Loadout Conveyor (D21)*	2008	10,000
Dryer Reclaim Drag Conveyor (D22)	1998	6,000
Jump Drag Conveyor (D23)	1998	10,000
Long Belt Conveyor (B4)	1990	10,000
Short Belt Conveyor (B5)	1990	10,000
Portable Belt Conveyor	2005	7,000
Portable Belt Loader	2002	5,000

Note: Emissions units marked with an asterisk ("*") are considered affected facilities under 40 CFR 60, Subpart DD

(d) One (1) Storage system, identified as STORAGE, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, and consisting of the following:

(1) Four (4) metal storage tanks, identified as SE (T3), NE (T4), SW (T13), and NW (T14), constructed in 1987, with a combined storage capacity of 126,740 bushels (3802 tons) and a maximum fill capacity of 10,000 bushels per hour (300 tons/hr). Each of these four tanks are vented to the atmosphere, with each tank having four vents labeled a, b, c, and d, respectively. SE (T3) & NE (T4) have truck loadout spouts.

(2) One (1) metal storage tank, identified as the BIG TANK (T5), constructed in 1972, with storage capacity of 353,489 bushels (10,605 tons), a maximum fill capacity of 40,000 bushels per hour (1200 tons/hr) and a maximum unload capacity of 8,000 bushels per hour (240 tons/hr), vented to the atmosphere through vent 5a & 5b. The BIG TANK (T5) has a truck loadout spout.

(3) One (1) metal storage tank, identified as BROCK (T18), constructed in 1987, with storage capacity of 273,198 bushels (8196 tons) and a maximum fill capacity of 10,000 bushels per hour (300 tons/hr), vented to the atmosphere through ten vents, identified as vents 18 a-j.

(4) Three (3) concrete silos, identified as B1 (S10), B2 (S11), B3 (S12) constructed in 1977, with a combined storage capacity of 303,464 bushels (9104 tons) and a maximum fill capacity of 30,000 bushels per hour (900 tons/hr), vented to the atmosphere through vents 10a & b, 11a & b, and 12a &b, respectively. Silos B1, B2, and B3 have truck loadout spouts.

(5) One (1) temporary outdoor storage pile, on a concrete surface, covered by tarpaulin, identified as WEST PAD (XT2), with a capacity of 1,001,000 bushels of grain (30,030 tons), constructed in 1972, with dimensions of 145 feet x 500 feet.

(6) One (1) temporary outdoor storage pile, on an asphalt surface, covered by tarpaulin, identified as EAST PAD (XT4), with a capacity of 1,666,000 bushels of grain (49,980 tons), constructed in 2006, with dimensions of 185 feet x 500 feet.

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

(7) One (1) over head storage tank, identified as West (T8), constructed in 1972, with total storage capacity of 21,381 bushels, with a maximum fill capacity of 20,000 bushels per hour (600 tons/hr), and exhausting through vent (8a) to the atmosphere.

(8) One (1) steel storage tank, constructed in 2009, identified as Bin 2, with total storage capacity of 27,286 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

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

(9) One (1) steel storage tank, constructed in 2009, identified as Bin 1**,** with total storage capacity of 21,631 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and with a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

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

(e) One (1) grain loadout operation, identified as SHIPPING, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, consisting of the following:

(1) One (1) truck loadout bin, identified as 1L, with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(2) Eleven (11) side draw truck loadout spouts, each with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(3) One (1) steel overhead loadout bin, identified as #3 OVERHEAD Tank (T17), constructed in 1972, and a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr), equipped with a loadout spout, with a storage capacity of 1,989 bushels (60 tons).

(4) One (1) Bulk Weigh Rail loadout system rated at 40,000 bushels per hour (1,200 tons/hr) with telescoping spouts, constructed in 2009.

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

(f) Underground conveyors.

(g) Paved roads and parking lots with public access. [326 IAC 6-4]

(h) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day and less than or equal to 10,000 gallons per month, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. Such storage tanks may be in a fixed location or on mobile equipment. [This operation is considered an affected facility under 40 CFR 63, Subpart CCCCCC]

(i) Pressurized storage tanks and associated piping for Acetylene.

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M153-32926-00038, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

(a) All terms and conditions of permits established prior to M153-32926-00038 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

B.14 Source Modification Requirement

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

(a) Violation of any conditions of this permit.

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on May 2, 2013. The plan is included as Attachment A.

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.

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

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

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

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

C.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.

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.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 2-6.1-5(a)(2)]

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11]

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

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

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

C.15 Malfunctions Report [326 IAC 1-6-2]

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

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

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

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

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

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

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

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

Indianapolis, Indiana 46204-2251

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]: Grain Processing And Storage

(a) One (1) enclosed grain receiving operation, identified as RECEIVING, constructed in 1972 and approved for modification in 2009, and consisting of the following:

(1) One (1) truck dump pit, identified as Pit #1 (P1), with a maximum capacity of 20,000 bushels per hour (600 tons/hr), equipped with a baffle for particulate control.

(2) One (1) truck dump pit, identified as Pit #2 (P2), with a maximum capacity of 20,000 bushels per hour (600 tons/hr), equipped with a baffle for particulate control.

(3) One (1) truck dump pit, identified as Pit #3 (P3), with a maximum capacity of 10,000 bushels per hour (300 tons/hr), with emissions exhausted to the atmosphere.

(b) One (1) column grain dryer, with a natural gas-fired, low emission cyclone burner, identified as DRYER1, constructed in 1998, with a plate perforation diameter of 0.07 inches, with a maximum heat input capacity of 41.96 MMBtu/hr and a maximum throughput rate of 4,700 bushels of grain per hour (140 tons/hr). The dryer is loaded by the Wet Leg (L6) & emptied by the Dry Leg (L7).

(c) One (1) internal handling operation, identified as Grain Conveying, with a maximum capacity of 54,700 bushels per hour (1,641 tons per hour), constructed between 1962 and 2010, consisting of bucket elevators (legs), drag conveyors, belt conveyors, distributors and augers, consisting of the following:

Emissions Unit Description	Year Constructed	Maximum (bushels/hr)
40,000 Belt Conveyor (B1)*	2006	40,000
B Bin South Bottom Drag Conveyor (D7)	2003	20,000
B Bin North Bottom Drag Conveyor (D6)	2003	20,000
East Pad Belt Conveyor (B2)*	2006	20,000
Leg 1 (L1)	2001	20,000
Pit Drag Conveyor 1 (D1)	2001	20,000
Pit Drag Conveyor 3 (D3)*	2007	10,000
Brock Drag Conveyor (D9)	1972	10,000
Brock Reclaim Conveyor (D16)	1987	10,000
Leg 2 (L2)	1972	20,000
Pit Drag Conveyor 2 (D2)	1972	20,000
Dry Leg (L7)	1998	8,000
Big Tank Belt Conveyor (B3)	1972	8,000
Big Tank Conveyor 1 (D15)	1990	8,000
Leg 3 (L3)	1972	10,000
Wet Leg (L6)	1998	6,000
NE Drag Conveyor (D13)	1972	6,000
SE Drag Conveyor (D12)	1972	6,000
NW Drag Conveyor (D11)	1972	6,000
SW Drag Conveyor (D10)	1972	6,000

B Bin Auger (A1)	1972	4,000
SW Pad Auger (A3)	1972	3,500
NW Pad Auger (A2)	1972	3,500
Bin 1 Reclaim Conveyor (D17)*	2009	7,500
Bin 2 Reclaim Conveyor (D18)*	2009	7,500
B-Bin Top Fill Drag Conveyor (D19)*	2008	30,000
Big Tank Conveyor 2 (D20)*	2010	10,000
Loadout Conveyor (D21)*	2008	10,000
Dryer Reclaim Drag Conveyor (D22)	1998	6,000
Jump Drag Conveyor (D23)	1998	10,000
Long Belt Conveyor (B4)	1990	10,000
Short Belt Conveyor (B5)	1990	10,000
Portable Belt Conveyor	2005	7,000
Portable Belt Loader	2002	5,000

Note: Emissions units marked with an asterisk ("*") are considered affected facilities under 40 CFR 60, Subpart DD.

(d) One (1) Storage system, identified as STORAGE, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, and consisting of the following:

(1) Four (4) metal storage tanks, identified as SE (T3), NE (T4), SW (T13), and NW (T14), constructed in 1987, with a combined storage capacity of 126,740 bushels (3802 tons) and a maximum fill capacity of 10,000 bushels per hour (300 tons/hr). Each of these four tanks are vented to the atmosphere, with each tank having four vents labeled a, b, c, and d, respectively. SE (T3) & NE (T4) have truck loadout spouts.

(2) One (1) metal storage tank, identified as the BIG TANK (T5), constructed in 1972, with storage capacity of 353,489 bushels (10,605 tons), a maximum fill capacity of 40,000 bushels per hour (1200 tons/hr) and a maximum unload capacity of 8,000 bushels per hour (240 tons/hr), vented to the atmosphere through vent 5a & 5b. The BIG TANK (T5) has a truck loadout spout.

(3) One (1) metal storage tank, identified as BROCK (T18), constructed in 1987, with storage capacity of 273,198 bushels (8196 tons) and a maximum fill capacity of 10,000 bushels per hour (300 tons/hr), vented to the atmosphere through ten vents, identified as vents 18 a-j.

(4) Three (3) concrete silos, identified as B1 (S10), B2 (S11), B3 (S12) constructed in 1977, with a combined storage capacity of 303,464 bushels (9104 tons) and a maximum fill capacity of 30,000 bushels per hour (900 tons/hr), vented to the atmosphere through vents 10a & b, 11a & b, and 12a &b, respectively. Silos B1, B2, and B3 have truck loadout spouts.

(5) One (1) temporary outdoor storage pile, on a concrete surface, covered by tarpaulin, identified as WEST PAD (XT2), with a capacity of 1,001,000 bushels of grain (30,030 tons), constructed in 1972, with dimensions of 145 feet x 500 feet.

(6) One (1) temporary outdoor storage pile, on an asphalt surface, covered by tarpaulin, identified as EAST PAD (XT4), with a capacity of 1,666,000 bushels of grain (49,980 tons), constructed in 2006, with dimensions of 185 feet x 500 feet.

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

(7) One (1) over head storage tank, identified as West (T8), constructed in 1972, with total storage capacity of 21,381 bushels, with a maximum fill capacity of 20,000 bushels per hour (60 tons/hr), and exhausting through vent (8a) to the atmosphere.

(8) One (1) steel storage tank, constructed in 2009, identified as Bin 2, with total storage capacity of 27,286 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

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

(9) One (1) steel storage tank, constructed in 2009, identified as Bin 1, with total storage capacity of 21,631 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and with a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

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

(e) One (1) grain loadout operation, identified as SHIPPING, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, consisting of the following:

(1) One (1) truck loadout bin, identified as 1L, with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(2) Eleven (11) side draw truck loadout spouts, each with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(3) One (1) steel overhead loadout bin, identified as #3 OVERHEAD Tank (T17), constructed in 1972, and a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr), equipped with a loadout spout, with a storage capacity of 1,989 bushels (60 tons).

(4) One (1) Bulk Weigh Rail loadout system rated at 40,000 bushels per hour (1,200 tons/hr) with telescoping spouts, constructed in 2009.

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

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

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

D.1.1 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each process shall be limited by the following:

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

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

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The following table shows the maximum process weight rate and allowable particulate emission rate for each emission unit:

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (tons/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)
Truck Loadout Spouts (11)	10,000	300	63.0
40,000 Belt Conveyor (B1)	40,000	1,200	80.0
B Bin South Bottom Drag Conveyor (D7)	20,000	600	71.2
B Bin North Bottom Drag Conveyor (D6)	20,000	600	71.2
East Pad Belt Conveyor (B2)	20,000	600	71.2
Pit #1 (P1)*	20,000	600	71.2
Leg 1 (L1)	20,000	600	71.2
Pit Drag Conveyor 1 (D1)	20,000	600	71.2
Pit Drag Conveyor 3 (D3)	10,000	300	63.0
Brock Drag Conveyor (D9)	10,000	300	63.0
Brock Reclaim Conveyor (D16)	10,000	300	63.0
Pit #2 (P2)*	20,000	600	71.2
Leg 2 (L2)	20,000	600	71.2
Pit Drag Conveyor 2 (D2)	20,000	600	71.2
Dry Leg (L7)	8,000	240	60.5
Big Tank Belt Conveyor (B3)	8,000	240	60.5
Big Tank Conveyor 1 (D15)	8,000	240	60.5
Pit #3 (P3)	10,000	300	63.0
Leg 3 (L3)	10,000	300	63.0
Wet Leg (L6)	6,000	180	57.4
NE Drag Conveyor (D13)	6,000	180	57.4
SE Drag Conveyor (D12)	6,000	180	57.4
NW Drag Conveyor (D11)	6,000	180	57.4
SW Drag Conveyor (D10)	6,000	180	57.4
B Bin Auger (A1)	4,000	120	53.1
SW Pad Auger (A3)	3,500	105	51.8
NW Pad Auger (A2)	3,500	105	51.8
Bin 1 Reclaim Conveyor (D17)	7,500	225	59.8
Bin 2 Reclaim Conveyor (D18)	7,500	225	59.8
B-Bin Top Fill Drag Conveyor (D19)	30,000	900	76.2
Big Tank Conveyor 2 (D20)	10,000	300	63.0
Loadout Conveyor (D21)	10,000	300	63.0
Dryer Reclaim Drag Conveyor (D22)	6,000	180	57.4
Jump Drag Conveyor (D23)	10,000	300	63.0
Long Belt Conveyor (B4)	10,000	300	63.0
Short Belt Conveyor (B5)	10,000	300	63.0
Truck Loadout Bin (1L)	10,000	300	63.0
Overhead Tank (T17)	10,000	300	63.0
Bulk Weigh Rail Loadout System **	40,000	1,200	80.0
Four (4) metal storage tanks (T3, T4, T13 and T14)	10,000	300	63.0
One (1) metal storage tank (T5)	40,000	1,200	80.0

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (tons/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)
One (1) metal storage tank (T18)	10,000	300	63.0
Three (3) concrete silos (S10, S11 and S12)	30,000	900	76.2
One (1) Overhead Storage Tank (T8)	20,000	600	71.2
One (1) Steel Storage Tank (Bin 1)	20,000	600	71.2
One (1) Steel Storage Tank (Bin 2)	20,000	600	71.2
Portable Belt Conveyor	7,000	210	59.0
Portable Belt Loader	5,000	150	55.4
Dryer 1	4,700	141	54.8
* Pit baffles at Pit #1 and Pit #2 were added as the control for grain receiving emissions			
** Rail shipments only			

(b) Pursuant to 326 IAC 6-3-2(e)(3), when the process weight exceeds 200 tons per hour, the maximum allowable emission may exceed the emission limits shown in the table above, provided the concentration of particulate matter in the gas discharged to the atmosphere is less than 0.10 pounds per 1,000 pounds of gases.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the emission units identified in the table contained in Condition D.1.1(a) above. 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.1.3 Particulate Control

In order to comply with Condition D.1.1, the baffles associated with the two (2) truck receiving pits (Pit #1 and Pit #2) shall be in operation and control particulate emissions from the respective receiving pit at all times the receiving pits are in operation.

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

D.1.4 Visible Emissions Notations

(a) Daily visible emission notations of the grain receiving, handling, drying, and shipping facilities 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 a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.4, the Permittee shall maintain a daily record of visible emission notations of the grain receiving, handling, drying, and shipping facilities. 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).

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

SECTION E.1 FACILITY OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) enclosed grain receiving operation, identified as RECEIVING, constructed in 1972 and approved for modification in 2009, and consisting of the following:

(1) One (1) truck dump pit, identified as Pit #1 (P1), with a maximum capacity of 20,000 bushels per hour (600 tons/hr), equipped with a baffle for particulate control.

(2) One (1) truck dump pit, identified as Pit #2 (P2), with a maximum capacity of 20,000 bushels per hour (600 tons/hr), equipped with a baffle for particulate control.

(3) One (1) truck dump pit, identified as Pit #3 (P3), with a maximum capacity of 10,000 bushels per hour (300 tons/hr), with emissions exhausted to the atmosphere.

(b) One (1) column grain dryer, with a natural gas-fired, low emission cyclone burner, identified as DRYER1, constructed in 1998, with a plate perforation diameter of 0.07 inches, with a maximum heat input capacity of 41.96 MMBtu/hr and a maximum throughput rate of 4,700 bushels of grain per hour (140 tons/hr). The dryer is loaded by the Wet Leg (L6) & emptied by the Dry Leg (L7).

(c) One (1) internal handling operation, identified as Grain Conveying, with a maximum capacity of 54,700 bushels per hour (1,641 tons per hour), constructed between 1962 and 2010, consisting of bucket elevators (legs), drag conveyors, belt conveyors, distributors and augers, consisting of the following:

Emissions Unit Description	Year Constructed	Maximum (bushels/hr)
40,000 Belt Conveyor (B1)*	2006	40,000
B Bin South Bottom Drag Conveyor (D7)	2003	20,000
B Bin North Bottom Drag Conveyor (D6)	2003	20,000
East Pad Belt Conveyor (B2)*	2006	20,000
Leg 1 (L1)	2001	20,000
Pit Drag Conveyor 1 (D1)	2001	20,000
Pit Drag Conveyor 3 (D3)*	2007	10,000
Brock Drag Conveyor (D9)	1972	10,000
Brock Reclaim Conveyor (D16)	1987	10,000
Leg 2 (L2)	1972	20,000
Pit Drag Conveyor 2 (D2)	1972	20,000
Dry Leg (L7)	1998	8,000
Big Tank Belt Conveyor (B3)	1972	8,000
Big Tank Conveyor 1 (D15)	1990	8,000
Leg 3 (L3)	1972	10,000
Wet Leg (L6)	1998	6,000
NE Drag Conveyor (D13)	1972	6,000
SE Drag Conveyor (D12)	1972	6,000
NW Drag Conveyor (D11)	1972	6,000
SW Drag Conveyor (D10)	1972	6,000
B Bin Auger (A1)	1972	4,000
SW Pad Auger (A3)	1972	3,500
NW Pad Auger (A2)	1972	3,500

Bin 1 Reclaim Conveyor (D17)*	2009	7,500
Bin 2 Reclaim Conveyor (D18)*	2009	7,500
B-Bin Top Fill Drag Conveyor (D19)*	2008	30,000
Big Tank Conveyor 2 (D20)*	2010	10,000
Loadout Conveyor (D21)*	2008	10,000
Dryer Reclaim Drag Conveyor (D22)	1998	6,000
Jump Drag Conveyor (D23)	1998	10,000
Long Belt Conveyor (B4)	1990	10,000
Short Belt Conveyor (B5)	1990	10,000
Portable Belt Conveyor	2005	7,000
Portable Belt Loader	2002	5,000

Note: Emissions units marked with an asterisk ("*") are considered affected facilities under 40 CFR 60, Subpart DD.

(d) One (1) Storage system, identified as STORAGE, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, and consisting of the following:

(1) Four (4) metal storage tanks, identified as SE (T3), NE (T4), SW (T13), and NW (T14), constructed in 1987, with a combined storage capacity of 126,740 bushels (3802 tons) and a maximum fill capacity of 10,000 bushels per hour (300 tons/hr). Each of these four tanks are vented to the atmosphere, with each tank having four vents labeled a, b, c, and d, respectively. SE (T3) & NE (T4) have truck loadout spouts.

(2) One (1) metal storage tank, identified as the BIG TANK (T5), constructed in 1972, with storage capacity of 353,489 bushels (10,605 tons), a maximum fill capacity of 40,000 bushels per hour (1200 tons/hr) and a maximum unload capacity of 8,000 bushels per hour (240 tons/hr), vented to the atmosphere through vent 5a & 5b. The BIG TANK (T5) has a truck loadout spout.

(3) One (1) metal storage tank, identified as BROCK (T18), constructed in 1987, with storage capacity of 273,198 bushels (8196 tons) and a maximum fill capacity of 10,000 bushels per hour (300 tons/hr), vented to the atmosphere through ten vents, identified as vents 18 a-j.

(4) Three (3) concrete silos, identified as B1 (S10), B2 (S11), B3 (S12) constructed in 1977, with a combined storage capacity of 303,464 bushels (9104 tons) and a maximum fill capacity of 30,000 bushels per hour (900 tons/hr), vented to the atmosphere through vents 10a & b, 11a & b, and 12a &b, respectively. Silos B1, B2, and B3 have truck loadout spouts.

(5) One (1) temporary outdoor storage pile, on a concrete surface, covered by tarpaulin, identified as WEST PAD (XT2), with a capacity of 1,001,000 bushels of grain (30,030 tons), constructed in 1972, with dimensions of 145 feet x 500 feet.

(6) One (1) temporary outdoor storage pile, on an asphalt surface, covered by tarpaulin, identified as EAST PAD (XT4), with a capacity of 1,666,000 bushels of grain (49,980 tons), constructed in 2006, with dimensions of 185 feet x 500 feet.

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

(7) One (1) over head storage tank, identified as West (T8), constructed in 1972, with total storage capacity of 21,381 bushels, with a maximum fill capacity of 20,000 bushels per hour (600 tons/hr), and exhausting through vent (8a) to the atmosphere.

(8) One (1) steel storage tank, constructed in 2009, identified as Bin 2, with total storage capacity of 27,286 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

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

(9) One (1) steel storage tank, constructed in 2009, identified as Bin 1, with total storage capacity of 21,631 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and with a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

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

(e) One (1) grain loadout operation, identified as SHIPPING, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, consisting of the following:

(1) One (1) truck loadout bin, identified as 1L, with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(2) Eleven (11) side draw truck loadout spouts, each with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(3) One (1) steel overhead loadout bin, identified as #3 OVERHEAD Tank (T17), constructed in 1972, and a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr), equipped with a loadout spout, with a storage capacity of 1,989 bushels (60 tons).

(4) One (1) Bulk Weigh Rail loadout system rated at 40,000 bushels per hour (1,200 tons/hr) with telescoping spouts, constructed in 2009.

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

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

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

(a) The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the affected facilities comprising the grain handling operations, except when otherwise specified in 40 CFR 60, Subpart DD.

(b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 New Source Performance Standards (NSPS) for Grain Elevators [40 CFR 60, Subpart DD] [326 IAC 12]

The Permittee, which operates a grain storage elevator which commenced construction after August 3, 1978, shall comply with the following provisions of 40 CFR Part 60, Subpart DD, (included as Attachment B of this permit) which are incorporated by reference as 326 IAC 12, except as otherwise specified in 40 CFR 60, Subpart DD.

This source is subject to the following portions of Subpart DD.

(1) 40 CFR 60.300
(2) 40 CFR 60.301
(3) 40 CFR 60.302(b) and (c)(1) through (3)
(4) 40 CFR 60.303
(5) 40 CFR 60.304

Compliance Determination Requirements

E.1.3 Testing Requirements [326 IAC 2-1.1-11]

Not later than 180 days of after issuance of MSOP Renewal No. M153-32926-00038, in order to comply with Condition E.1.2, the Permittee shall perform the performance testing required under NSPS 40 CFR 60, Subpart DD, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

SECTION E.2 FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

(h) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day and less than or equal to 10,000 gallons per month, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. Such storage tanks may be in a fixed location or on mobile equipment. [This operation is considered an affected facility under 40 CFR 63, Subpart CCCCCC]

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

National Emission Standards for Hazardous Air Pollutants

E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.11130, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, as specified in Table 3 of 40 CFR Part 63, Subpart CCCCCC in accordance with the schedule in 40 CFR 63 Subpart CCCCCC.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.2.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) For Gasoline Dispensing Facilities [40 CFR Part 63 Subpart CCCCCC]

The Permittee, which owns and operates an existing gasoline dispensing facility at an area source of HAPs, shall comply with the following provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment C of this permit).

(1) 40 CFR 63.11110
(2) 40 CFR 63.11111(a), (b), (e), (f), (h), (i), (j), and (k)
(3) 40 CFR 63.11112(a) and (d)
(4) 40 CFR 63.11113(b) and (c)
(5) 40 CFR 63.11115
(6) 40 CFR 63.11116
(7) 40 CFR 63.11130
(8) 40 CFR 63.11131
(9) 40 CFR 63.11132
(10) Table 3

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	Gavilon Grain, LLC
Address:	7646 North Co. Rd. 125 East
City:	Shelburn, Indiana 47879
Phone #:	812-397-5710
MSOP #:	M153-32926-00038

I hereby certify that Gavilon Grain, LLC is :
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Gavilon Grain, LLC is :
- ☐ in compliance with the requirements of MSOP M153-32926-00038.
- ☐ not in compliance with the requirements of MSOP M153-32926-00038.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

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

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

Attachment A:

FUGITIVE PARTICULATES CONTROL PLAN

Minor Source Operating Permit (MSOP) Renewal No. M153-32926-00038

Gavilon Grain, LLC
7646 North County Road 125 East
Shelburn, Indiana 47879

FUGITIVE DUST CONTROL PLAN
GAVILON GRAIN, LLC

Name and address of the source:
326 IAC 6-5-5(a)(1)
Gavilon Grain, LLC
7646 North County Road 125 East
Shelburn, IN 47879

Name and address of the owner or operator responsible for the execution of the plan:
326 IAC 6-5-5(a)(2)
Dennis Copeland, Elevator Manager
Gavilon Grain, LLC
7646 North County Road 125 East
Shelburn, IN 47879

Type and quantity of material handled:
326 IAC 6-5-5(a)(6)
Gavilon Grain operates a grain elevator. The elevator receives grain (typically corn, soybeans and/or wheat) from nearby farms. The potential annual throughput of the elevator is approximately 16,600,000 bushels of grain.

Processes, operations, and areas which have the potential to emit fugitive particulate matter:
326 IAC 6-5-5(a)(3)
The following operations have the potential to emit fugitive particulate matter: grain unloading and loading and grain handling at the elevator and the temporary ground storage pile. Fugitive particulate matter may also be generated due to wind erosion at the storage pile and by haul road traffic.

Map showing areas where fugitive particulate matter is generated:
326 IAC 6-5-5(a)(4)
An aerial photograph of the site showing the elevator bins, temporary ground storage pile, conveyors, haul roads and parking areas is attached.

Number and mix of vehicular activity occurring on paved roads, unpaved roads, and parking lots:
326 IAC 6-5-5(a)(5)
Haul roads and parking areas at the elevator are unpaved. Grain is delivered from the farm by straight trucks (end dumps) and hopper bottom trucks. In recent years, the percentage of straight truck deliveries has been below 30% of incoming receipts. Front end loaders and hopper bottom trucks are used for internal transfers of grain from the temporary ground storage pile to the elevator. Hopper bottom trucks are utilized for shipments. In recent years, grain shipments by truck have comprised less than 20% of outbound shipments, with the majority of grain shipped via rail. Light duty vehicle activity is minimal (e.g. employees personal vehicles, shop truck) and these vehicles are not used to haul grain.

Equipment used to maintain pile:
326 IAC 6-5-5(a)(7)
Grain may be stored in a temporary ground storage pile. Grain is transferred to ground storage piles via belt conveyors. A front end loader is used to pick up and load grain from the pile into hopper bottom trucks for transfer to the elevator. The elevator has the capability to apply mineral oil to grain that is

transferred to the pile. Depending upon the length of anticipated storage, a tarpaulin may be used to cover grain stored in the pile.

Measures to be implemented to control fugitive particulate matter emissions:
326 IAC 6-5-5(a)(8)
Gavilon will implement control measures listed below on an "as needed basis" (i.e. the frequency of application determined necessary to minimize visible particulate matter emissions). The determination of which controls to implement will be based upon:

- Daily grain quality;
- Daily informal housekeeping and facility inspections; and/or
- Weekly formalized facility-wide housekeeping inspections.

1) Fugitive particulate matter (dust) emissions resulting from grain unloading and loading operations from storage facilities such as bins, hoppers, silos, storage pile, and onto or out of vehicles, shall be controlled by one or more of the following measures on an as needed basis:

    a) Limiting free fall distance of grain;
    b) Limiting the unloading / loading rate of grain (i.e. choke feeding);
    c) Utilizing baffles on truck dump pits;
    d) Utilizing socks/sleeves on loading spouts;
    e) Utilizing partial enclosures of the grain loading/unloading areas;
    f) Applying mineral oil to grain; and/or
    g) An equivalent alternate measure.

2) Fugitive particulate matter (dust) emissions from grain handling equipment, including bucket elevators (legs), drag conveyors, belt conveyors, augers, transfer points, screens, trippers, garners, scales, etc. shall be controlled by one or more of the following measures on an as needed basis:

    a) Limiting free fall distance of grain;
    b) Enclosing or partially enclosing grain handling equipment;
    c) Applying mineral oil to grain; and/or
    d) An equivalent alternate measure.

3) Fugitive particulate matter (dust) emissions from temporary ground storage piles of grain shall be controlled by one or more of the following measures on an as needed basis:

    a) Cleaning the area around the perimeter of the pile;
    b) Applying mineral oil to grain;
    c) Covering pile with a tarpaulin to minimize wind erosion; and/or
    d) An equivalent alternate measure.

4) Fugitive particulate matter (dust) emissions from paved roads, unpaved roads, and parking lots shall be controlled by one or more of the following measures on an as needed basis:

    a) Paved roads and parking lots:
        i) Flushing;
        ii) Sweeping, while wet either from rain or application of water; and/or

iii) An equivalent alternate measure.

b) Unpaved roads and parking lots:
   i) Paving with a material such as asphalt or concrete;
   ii) Treating with emulsified asphalt (or other suitable and effective oil or chemical dust suppressant approved by IDEM OAQ);
   iii) Spraying with water;
   iv) Sealing and/or maintaining the road surface; and/or
   v) An equivalent alternate measure.

5) Housekeeping and maintenance practices have been implemented to minimize the opportunity for particulate matter to become airborne and leave the property.

a) Housekeeping Practices

i) Accumulations of dust and/or grain shall be minimized by sweeping and cleaning on an as needed basis. Housekeeping shall be checked daily when the elevator is operating. Areas to be inspected include, but are not limited to: unloading areas, floors, decks, hopper areas, loading areas and grain dryers.

ii) Collected dust, grain or other waste material shall be handled and disposed in a manner that minimizes generation of fugitive dust.

iii) General grounds, yard, and other open areas shall be maintained.

iv) Accidental spills and other accumulations shall be cleaned up as soon as practicable.

b) Equipment Maintenance

i) Equipment maintenance will be conducted in a manner that eliminates or minimizes emissions from equipment due to:

(1) Malfunctions;
(2) Breakdowns;
(3) Improper adjustment;
(4) Operating above the rated or designed capacity;
(5) Not following designed operating specifications;
(6) Lack of good preventive maintenance care;
(7) Lack of critical and proper spare replacement parts on hand; and/or
(8) Lack of properly trained and experienced personnel.

<u>Specification of the dust suppressant material:</u>
326 IAC 6-5-5(a)(9)
As needed to control visible dust emissions, Gavilon has the capability to apply food grade mineral oil to grain. When used, mineral oil will typically be applied at a minimum rate of 0.5 gallons per 1,000 bushels of grain received. The decision to apply mineral oil will be based on daily grain quality observations.

Other dust suppressants, approved by IDEM OAQ, may be used to control haul road emissions.

Application rates will be determined based on prevailing conditions and/or manufacturer's recommendations. The decision to apply dust control to haul roads will be based on visual observations.

Specifications of the particulate matter collection equipment:
326 IAC 6-5-5(a)(10)
Particulate matter collection equipment is not utilized at the facility.

The mineral oil application system consists of a storage tank, hose, pumps, meters and spray nozzles. Proper operation of the mineral oil system is verified by periodically checking that the nozzles are operating and the application rate.

Passive control equipment (pit baffles, truck socks, conveyor enclosures, partially enclosed buildings) will be selected, installed and maintained according to manufacturer's recommendations, and/or best engineering judgment.

Schedule of compliance:
326 IAC 6-5-5(a)(11)
To comply with proposed permit requirements, Gavilon is planning to install pit baffles at Dump Pit 1, Dump Pit 2 and Dump Pit 3. Gavilon anticipates the pit baffles will be installed prior to harvest (September 1, 2013).

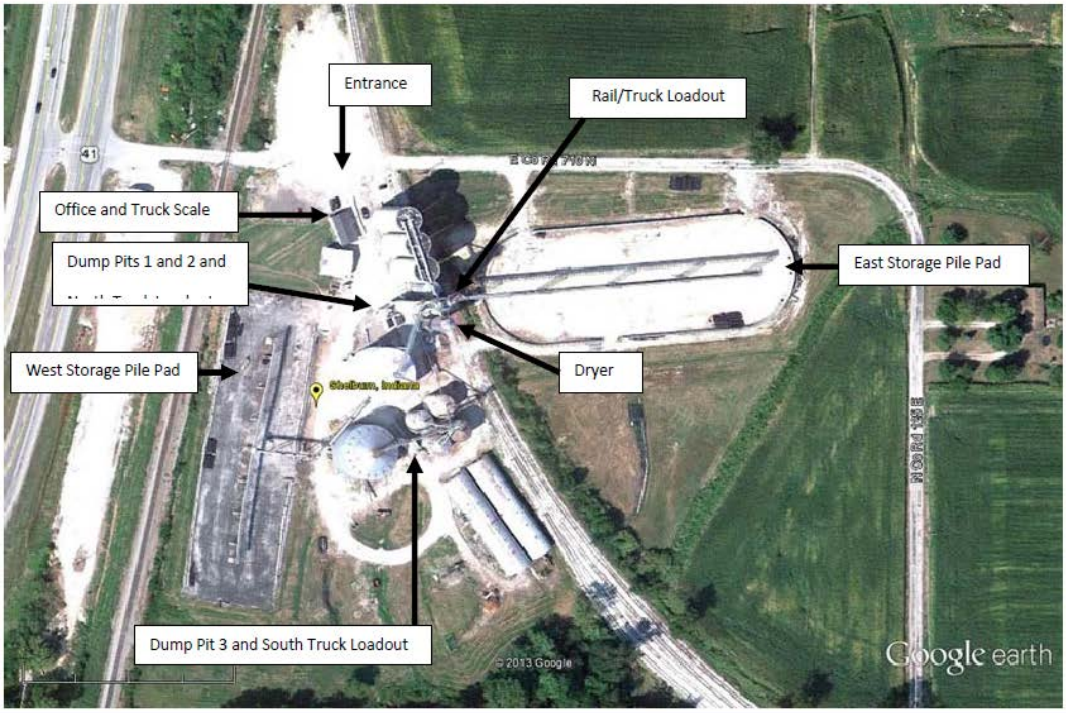
Recordkeeping:
326 IAC 6-5-5(b)
Decisions to utilize controls will be based upon observations of grain quality and housekeeping, general facility, storage pile and haul road conditions.

- Various facility conditions are documented daily on the Grain Closing Time Inspection Report.

- According to Gavilon's Grain Housekeeping Plan, facility personnel conduct daily informal inspections of priority areas (no documentation required).

- Weekly formal facility-wide inspections are conducted and documented on the Weekly Housekeeping Inspection Log.

The use of active controls (i.e. application of mineral oil, treatment of haul road with water or dust suppressant) will be documented.



Drawing Name:	Aerial Photo	**Drawn By:**	Beth Pierson
		Revision Date:	05-02-2013

Attachment B:

NSPS Subpart DD

Minor Source Operating Permit (MSOP) Renewal No. M153-32926-00038

Gavilon Grain, LLC
7646 North County Road 125 East
Shelburn, Indiana 47879

Title 40: Protection of Environment

PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

Subpart DD—Standards of Performance for Grain Elevators

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

§ 60.300 Applicability and designation of affected facility.

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

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

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

§ 60.301 Definitions.

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

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

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

(c) *Grain terminal elevator* means any grain elevator which has a permanent storage capacity of more than 88,100 m^3 (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots.

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

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

(f) *Grain storage elevator* means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 35,200 m^3 (ca. 1 million bushels).

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

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

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

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

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

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

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

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

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

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

§ 60.302 Standard for particulate matter.

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

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

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

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

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

(2) Exhibits greater than 0 percent opacity.

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

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

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

(3) Any truck loading station which exhibits greater than 10 percent opacity.

(4) Any barge or ship loading station which exhibits greater than 20 percent opacity.

(d) The owner or operator of any barge or ship unloading station shall operate as follows:

(1) The unloading leg shall be enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device shall be maintained on both sides of the leg and the grain receiving hopper.

(2) The total rate of air ventilated shall be at least 32.1 actual cubic meters per cubic meter of grain handling capacity (ca. 40 ft^3 /bu).

(3) Rather than meet the requirements of paragraphs (d)(1) and (2) of this section the owner or operator may use other methods of emission control if it is demonstrated to the Administrator's satisfaction that they would reduce emissions of particulate matter to the same level or less.

§ 60.303 Test methods and procedures.

(a) In conducting the performance tests required in §60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b). Acceptable alternative methods and procedures are given in paragraph (c) of this section.

(b) The owner or operator shall determine compliance with the particulate matter standards in §60.302 as follows:

(1) Method 5 shall be used to determine the particulate matter concentration and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 1.70 dscm (60 dscf). The probe and filter holder shall be operated without heaters.

(2) Method 2 shall be used to determine the ventilation volumetric flow rate.

(3) Method 9 and the procedures in §60.11 shall be used to determine opacity.

(c) The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:

(1) For Method 5, Method 17 may be used.

[54 FR 6674, Feb. 14, 1989]

§ 60.304 Modifications.

(a) The factor 6.5 shall be used in place of “annual asset guidelines repair allowance percentage,” to determine whether a capital expenditure as defined by §60.2 has been made to an existing facility.

(b) The following physical changes or changes in the method of operation shall not by themselves be considered a modification of any existing facility:

(1) The addition of gravity loadout spouts to existing grain storage or grain transfer bins.

(2) The installation of automatic grain weighing scales.

(3) Replacement of motor and drive units driving existing grain handling equipment.

(4) The installation of permanent storage capacity with no increase in hourly grain handling capacity.

Attachment C:

NESHAP Subpart CCCCCC

Minor Source Operating Permit (MSOP) Renewal No. M153-32926-00038

Gavilon Grain, LLC
7646 North County Road 125 East
Shelburn, Indiana 47879

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

Subpart CCCCCC—National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

SOURCE: 73 FR 1945, Jan. 10, 2008, unless otherwise noted.

What This Subpart Covers

§ 63.11110 What is the purpose of this subpart?

This subpart establishes national emission limitations and management practices for hazardous air pollutants (HAP) emitted from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF). This subpart also establishes requirements to demonstrate compliance with the emission limitations and management practices.

§ 63.11111 Am I subject to the requirements in this subpart?

(a) The affected source to which this subpart applies is each GDF that is located at an area source. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank.

(b) If your GDF has a monthly throughput of less than 10,000 gallons of gasoline, you must comply with the requirements in § 63.11116.

(c) If your GDF has a monthly throughput of 10,000 gallons of gasoline or more, you must comply with the requirements in § 63.11117.

(d) If your GDF has a monthly throughput of 100,000 gallons of gasoline or more, you must comply with the requirements in § 63.11118.

(e) An affected source shall, upon request by the Administrator, demonstrate that their monthly throughput is less than the 10,000-gallon or the 100,000-gallon threshold level, as applicable. For new or reconstructed affected sources, as specified in § 63.11112(b) and (c), recordkeeping to document monthly throughput must begin upon startup of the affected source. For existing sources, as specified in § 63.11112(d), recordkeeping to document monthly throughput must begin on January 10, 2008. For existing sources that are subject to this subpart only because they load gasoline into fuel tanks other than those in motor vehicles, as defined in § 63.11132, recordkeeping to document monthly throughput must begin on January 24, 2011. Records required under this paragraph shall be kept for a period of 5 years.

(f) If you are an owner or operator of affected sources, as defined in paragraph (a) of this section, you are not required to obtain a permit under 40 CFR part 70 or 40 CFR part 71 as a result of being subject to this subpart. However, you must still apply for and obtain a permit under 40 CFR part 70 or 40 CFR part 71 if you meet one or more of the applicability criteria found in 40 CFR 70.3(a) and (b) or 40 CFR 71.3(a) and (b).

(g) The loading of aviation gasoline into storage tanks at airports, and the subsequent transfer of aviation gasoline within the airport, is not subject to this subpart.

(h) Monthly throughput is the total volume of gasoline loaded into, or dispensed from, all the gasoline storage tanks located at a single affected GDF. If an area source has two or more GDF at separate locations within the area source, each GDF is treated as a separate affected source.

(i) If your affected source's throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable throughput threshold.

(j) The dispensing of gasoline from a fixed gasoline storage tank at a GDF into a portable gasoline tank for the on-site delivery and subsequent dispensing of the gasoline into the fuel tank of a motor vehicle or other gasoline-fueled engine or equipment used within the area source is only subject to § 63.11116 of this subpart.

(k) For any affected source subject to the provisions of this subpart and another Federal rule, you may elect to comply only with the more stringent provisions of the applicable subparts. You must consider all provisions of the rules, including monitoring, recordkeeping, and reporting. You must identify the affected source and provisions with which you will comply in your Notification of Compliance Status required under § 63.11124. You also must demonstrate in your Notification of Compliance Status that each provision with which you will comply is at least as stringent as the otherwise applicable requirements in this subpart. You are responsible for making accurate determinations concerning the more stringent provisions, and noncompliance with this rule is not excused if it is later determined that your determination was in error, and, as a result, you are violating this subpart. Compliance with this rule is your responsibility and the Notification of Compliance Status does not alter or affect that responsibility.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4181, Jan. 24, 2011]

§ 63.11112 What parts of my affected source does this subpart cover?

(a) The emission sources to which this subpart applies are gasoline storage tanks and associated equipment components in vapor or liquid gasoline service at new, reconstructed, or existing GDF that meet the criteria specified in § 63.11111. Pressure/Vacuum vents on gasoline storage tanks and the equipment necessary to unload product from cargo tanks into the storage tanks at GDF are covered emission sources. The equipment used for the refueling of motor vehicles is not covered by this subpart.

(b) An affected source is a new affected source if you commenced construction on the affected source after November 9, 2006, and you meet the applicability criteria in § 63.11111 at the time you commenced operation.

(c) An affected source is reconstructed if you meet the criteria for reconstruction as defined in § 63.2.

(d) An affected source is an existing affected source if it is not new or reconstructed.

§ 63.11113 When do I have to comply with this subpart?

(a) If you have a new or reconstructed affected source, you must comply with this subpart according to paragraphs (a)(1) and (2) of this section, except as specified in paragraph (d) of this section.

(1) If you start up your affected source before January 10, 2008, you must comply with the standards in this subpart no later than January 10, 2008.

(2) If you start up your affected source after January 10, 2008, you must comply with the standards in this subpart upon startup of your affected source.

(b) If you have an existing affected source, you must comply with the standards in this subpart no later than January 10, 2011.

(c) If you have an existing affected source that becomes subject to the control requirements in this subpart because of an increase in the monthly throughput, as specified in § 63.11111(c) or § 63.11111(d), you must comply with the standards in this subpart no later than 3 years after the affected source becomes subject to the control requirements in this subpart.

(d) If you have a new or reconstructed affected source and you are complying with Table 1 to this subpart, you must comply according to paragraphs (d)(1) and (2) of this section.

(1) If you start up your affected source from November 9, 2006 to September 23, 2008, you must comply no later than September 23, 2008.

(2) If you start up your affected source after September 23, 2008, you must comply upon startup of your affected source.

(e) The initial compliance demonstration test required under § 63.11120(a)(1) and (2) must be conducted as specified in paragraphs (e)(1) and (2) of this section.

(1) If you have a new or reconstructed affected source, you must conduct the initial compliance test upon installation of the complete vapor balance system.

(2) If you have an existing affected source, you must conduct the initial compliance test as specified in paragraphs (e)(2)(i) or (e)(2)(ii) of this section.

(i) For vapor balance systems installed on or before December 15, 2009, you must test no later than 180 days after the applicable compliance date specified in paragraphs (b) or (c) of this section.

(ii) For vapor balance systems installed after December 15, 2009, you must test upon installation of the complete vapor balance system.

(f) If your GDF is subject to the control requirements in this subpart only because it loads gasoline into fuel tanks other than those in motor vehicles, as defined in § 63.11132, you must comply with the standards in this subpart as specified in paragraphs (f)(1) or (f)(2) of this section.

(1) If your GDF is an existing facility, you must comply by January 24, 2014.

(2) If your GDF is a new or reconstructed facility, you must comply by the dates specified in paragraphs (f)(2)(i) and (ii) of this section.

(i) If you start up your GDF after December 15, 2009, but before January 24, 2011, you must comply no later than January 24, 2011.

(ii) If you start up your GDF after January 24, 2011, you must comply upon startup of your GDF.

[73 FR 1945, Jan. 10, 2008, as amended at 73 FR 35944, June 25, 2008; 76 FR 4181, Jan. 24, 2011]

Emission Limitations and Management Practices

§ 63.11115 What are my general duties to minimize emissions?

Each owner or operator of an affected source under this subpart must comply with the requirements of paragraphs (a) and (b) of this section.

(a) You must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(b) You must keep applicable records and submit reports as specified in § 63.11125(d) and § 63.11126(b).

[76 FR 4182, Jan. 24, 2011]

§ 63.11116 Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline.

(a) You must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

(1) Minimize gasoline spills;

(2) Clean up spills as expeditiously as practicable;

(3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;

(4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

(b) You are not required to submit notifications or reports as specified in § 63.11125, § 63.11126, or subpart A of this part, but you must have records available within 24 hours of a request by the Administrator to document your gasoline throughput.

(c) You must comply with the requirements of this subpart by the applicable dates specified in § 63.11113.

(d) Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with paragraph (a)(3) of this section.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4182, Jan. 24, 2011]

§ 63.11117 Requirements for facilities with monthly throughput of 10,000 gallons of gasoline or more.

(a) You must comply with the requirements in section § 63.11116(a).

(b) Except as specified in paragraph (c) of this section, you must only load gasoline into storage tanks at your facility by utilizing submerged filling, as defined in § 63.11132, and as specified in paragraphs (b)(1), (b)(2), or (b)(3) of this section. The applicable distances in paragraphs (b)(1) and (2)

shall be measured from the point in the opening of the submerged fill pipe that is the greatest distance from the bottom of the storage tank.

(1) Submerged fill pipes installed on or before November 9, 2006, must be no more than 12 inches from the bottom of the tank.

(2) Submerged fill pipes installed after November 9, 2006, must be no more than 6 inches from the bottom of the tank.

(3) Submerged fill pipes not meeting the specifications of paragraphs (b)(1) or (b)(2) of this section are allowed if the owner or operator can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe. Documentation providing such demonstration must be made available for inspection by the Administrator's delegated representative during the course of a site visit.

(c) Gasoline storage tanks with a capacity of less than 250 gallons are not required to comply with the submerged fill requirements in paragraph (b) of this section, but must comply only with all of the requirements in § 63.11116.

(d) You must have records available within 24 hours of a request by the Administrator to document your gasoline throughput.

(e) You must submit the applicable notifications as required under § 63.11124(a).

(f) You must comply with the requirements of this subpart by the applicable dates contained in § 63.11113.

[73 FR 1945, Jan. 10, 2008, as amended at 73 FR 12276, Mar. 7, 2008; 76 FR 4182, Jan. 24, 2011]

§ 63.11118 Requirements for facilities with monthly throughput of 100,000 gallons of gasoline or more.

(a) You must comply with the requirements in §§ 63.11116(a) and 63.11117(b).

(b) Except as provided in paragraph (c) of this section, you must meet the requirements in either paragraph (b)(1) or paragraph (b)(2) of this section.

(1) Each management practice in Table 1 to this subpart that applies to your GDF.

(2) If, prior to January 10, 2008, you satisfy the requirements in both paragraphs (b)(2)(i) and (ii) of this section, you will be deemed in compliance with this subsection.

(i) You operate a vapor balance system at your GDF that meets the requirements of either paragraph (b)(2)(i)(A) or paragraph (b)(2)(i)(B) of this section.

(A) Achieves emissions reduction of at least 90 percent.

(B) Operates using management practices at least as stringent as those in Table 1 to this subpart.

(ii) Your gasoline dispensing facility is in compliance with an enforceable State, local, or tribal rule or permit that contains requirements of either paragraph (b)(2)(i)(A) or paragraph (b)(2)(i)(B) of this section.

(c) The emission sources listed in paragraphs (c)(1) through (3) of this section are not required to comply with the control requirements in paragraph (b) of this section, but must comply with the requirements in § 63.11117.

(1) Gasoline storage tanks with a capacity of less than 250 gallons that are constructed after January 10, 2008.

(2) Gasoline storage tanks with a capacity of less than 2,000 gallons that were constructed before January 10, 2008.

(3) Gasoline storage tanks equipped with floating roofs, or the equivalent.

(d) Cargo tanks unloading at GDF must comply with the management practices in Table 2 to this subpart.

(e) You must comply with the applicable testing requirements contained in § 63.11120.

(f) You must submit the applicable notifications as required under § 63.11124.

(g) You must keep records and submit reports as specified in §§ 63.11125 and 63.11126.

(h) You must comply with the requirements of this subpart by the applicable dates contained in § 63.11113.

[73 FR 1945, Jan. 10, 2008, as amended at 73 FR 12276, Mar. 7, 2008]

Testing and Monitoring Requirements

§ 63.11120 What testing and monitoring requirements must I meet?

(a) Each owner or operator, at the time of installation, as specified in § 63.11113(e), of a vapor balance system required under § 63.11118(b)(1), and every 3 years thereafter, must comply with the requirements in paragraphs (a)(1) and (2) of this section.

(1) You must demonstrate compliance with the leak rate and cracking pressure requirements, specified in item 1(g) of Table 1 to this subpart, for pressure-vacuum vent valves installed on your gasoline storage tanks using the test methods identified in paragraph (a)(1)(i) or paragraph (a)(1)(ii) of this section.

(i) California Air Resources Board Vapor Recovery Test Procedure TP-201.1E,—Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves, adopted October 8, 2003 (incorporated by reference, see § 63.14).

(ii) Use alternative test methods and procedures in accordance with the alternative test method requirements in § 63.7(f).

(2) You must demonstrate compliance with the static pressure performance requirement specified in item 1(h) of Table 1 to this subpart for your vapor balance system by conducting a static pressure test on your gasoline storage tanks using the test methods identified in paragraphs (a)(2)(i), (a)(2)(ii), or (a)(2)(iii) of this section.

(i) California Air Resources Board Vapor Recovery Test Procedure TP-201.3,—Determination of 2-Inch WC Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities, adopted April 12, 1996, and amended March 17, 1999 (incorporated by reference, see § 63.14).

(ii) Use alternative test methods and procedures in accordance with the alternative test method requirements in § 63.7(f).

(iii) Bay Area Air Quality Management District Source Test Procedure ST-30—Static Pressure Integrity Test—Underground Storage Tanks, adopted November 30, 1983, and amended December 21, 1994 (incorporated by reference, *see* § 63.14).

(b) Each owner or operator choosing, under the provisions of § 63.6(g), to use a vapor balance system other than that described in Table 1 to this subpart must demonstrate to the Administrator or delegated authority under paragraph § 63.11131(a) of this subpart, the equivalency of their vapor balance system to that described in Table 1 to this subpart using the procedures specified in paragraphs (b)(1) through (3) of this section.

(1) You must demonstrate initial compliance by conducting an initial performance test on the vapor balance system to demonstrate that the vapor balance system achieves 95 percent reduction using the California Air Resources Board Vapor Recovery Test Procedure TP-201.1,—Volumetric Efficiency for Phase I Vapor Recovery Systems, adopted April 12, 1996, and amended February 1, 2001, and October 8, 2003, (incorporated by reference, see § 63.14).

(2) You must, during the initial performance test required under paragraph (b)(1) of this section, determine and document alternative acceptable values for the leak rate and cracking pressure requirements specified in item 1(g) of Table 1 to this subpart and for the static pressure performance requirement in item 1(h) of Table 1 to this subpart.

(3) You must comply with the testing requirements specified in paragraph (a) of this section.

(c) Conduct of performance tests. Performance tests conducted for this subpart shall be conducted under such conditions as the Administrator specifies to the owner or operator based on representative performance (*i.e.,* performance based on normal operating conditions) of the affected source. Upon request, the owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of performance tests.

(d) Owners and operators of gasoline cargo tanks subject to the provisions of Table 2 to this subpart must conduct annual certification testing according to the vapor tightness testing requirements found in § 63.11092(f).

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4182, Jan. 24, 2011]

Notifications, Records, and Reports

§ 63.11124 What notifications must I submit and when?

(a) Each owner or operator subject to the control requirements in § 63.11117 must comply with paragraphs (a)(1) through (3) of this section.

(1) You must submit an Initial Notification that you are subject to this subpart by May 9, 2008, or at the time you become subject to the control requirements in § 63.11117, unless you meet the requirements in paragraph (a)(3) of this section. If your affected source is subject to the control requirements in § 63.11117 only because it loads gasoline into fuel tanks other than those in motor

vehicles, as defined in § 63.11132, you must submit the Initial Notification by May 24, 2011. The Initial Notification must contain the information specified in paragraphs (a)(1)(i) through (iii) of this section. The notification must be submitted to the applicable EPA Regional Office and delegated State authority as specified in § 63.13.

(i) The name and address of the owner and the operator.

(ii) The address (i.e., physical location) of the GDF.

(iii) A statement that the notification is being submitted in response to this subpart and identifying the requirements in paragraphs (a) through (c) of § 63.11117 that apply to you.

(2) You must submit a Notification of Compliance Status to the applicable EPA Regional Office and the delegated State authority, as specified in § 63.13, within 60 days of the applicable compliance date specified in § 63.11113, unless you meet the requirements in paragraph (a)(3) of this section. The Notification of Compliance Status must be signed by a responsible official who must certify its accuracy, must indicate whether the source has complied with the requirements of this subpart, and must indicate whether the facilities' monthly throughput is calculated based on the volume of gasoline loaded into all storage tanks or on the volume of gasoline dispensed from all storage tanks. If your facility is in compliance with the requirements of this subpart at the time the Initial Notification required under paragraph (a)(1) of this section is due, the Notification of Compliance Status may be submitted in lieu of the Initial Notification provided it contains the information required under paragraph (a)(1) of this section.

(3) If, prior to January 10, 2008, you are operating in compliance with an enforceable State, local, or tribal rule or permit that requires submerged fill as specified in § 63.11117(b), you are not required to submit an Initial Notification or a Notification of Compliance Status under paragraph (a)(1) or paragraph (a)(2) of this section.

(b) Each owner or operator subject to the control requirements in § 63.11118 must comply with paragraphs (b)(1) through (5) of this section.

(1) You must submit an Initial Notification that you are subject to this subpart by May 9, 2008, or at the time you become subject to the control requirements in § 63.11118. If your affected source is subject to the control requirements in § 63.11118 only because it loads gasoline into fuel tanks other than those in motor vehicles, as defined in § 63.11132, you must submit the Initial Notification by May 24, 2011. The Initial Notification must contain the information specified in paragraphs (b)(1)(i) through (iii) of this section. The notification must be submitted to the applicable EPA Regional Office and delegated State authority as specified in § 63.13.

(i) The name and address of the owner and the operator.

(ii) The address (i.e., physical location) of the GDF.

(iii) A statement that the notification is being submitted in response to this subpart and identifying the requirements in paragraphs (a) through (c) of § 63.11118 that apply to you.

(2) You must submit a Notification of Compliance Status to the applicable EPA Regional Office and the delegated State authority, as specified in § 63.13, in accordance with the schedule specified in § 63.9(h). The Notification of Compliance Status must be signed by a responsible official who must certify its accuracy, must indicate whether the source has complied with the requirements of this subpart, and must indicate whether the facility's throughput is determined based on the volume of gasoline loaded into all storage tanks or on the volume of gasoline dispensed from all storage tanks. If your facility is in compliance with the requirements of this subpart at the time the Initial Notification required under

paragraph (b)(1) of this section is due, the Notification of Compliance Status may be submitted in lieu of the Initial Notification provided it contains the information required under paragraph (b)(1) of this section.

(3) If, prior to January 10, 2008, you satisfy the requirements in both paragraphs (b)(3)(i) and (ii) of this section, you are not required to submit an Initial Notification or a Notification of Compliance Status under paragraph (b)(1) or paragraph (b)(2) of this subsection.

(i) You operate a vapor balance system at your gasoline dispensing facility that meets the requirements of either paragraphs (b)(3)(i)(A) or (b)(3)(i)(B) of this section.

(A) Achieves emissions reduction of at least 90 percent.

(B) Operates using management practices at least as stringent as those in Table 1 to this subpart.

(ii) Your gasoline dispensing facility is in compliance with an enforceable State, local, or tribal rule or permit that contains requirements of either paragraphs (b)(3)(i)(A) or (b)(3)(i)(B) of this section.

(4) You must submit a Notification of Performance Test, as specified in § 63.9(e), prior to initiating testing required by § 63.11120(a) and (b).

(5) You must submit additional notifications specified in § 63.9, as applicable.

[73 FR 1945, Jan. 10, 2008, as amended at 73 FR 12276, Mar. 7, 2008; 76 FR 4182, Jan. 24, 2011]

§ 63.11125 What are my recordkeeping requirements?

(a) Each owner or operator subject to the management practices in § 63.11118 must keep records of all tests performed under § 63.11120(a) and (b).

(b) Records required under paragraph (a) of this section shall be kept for a period of 5 years and shall be made available for inspection by the Administrator's delegated representatives during the course of a site visit.

(c) Each owner or operator of a gasoline cargo tank subject to the management practices in Table 2 to this subpart must keep records documenting vapor tightness testing for a period of 5 years. Documentation must include each of the items specified in § 63.11094(b)(2)(i) through (viii). Records of vapor tightness testing must be retained as specified in either paragraph (c)(1) or paragraph (c)(2) of this section.

(1) The owner or operator must keep all vapor tightness testing records with the cargo tank.

(2) As an alternative to keeping all records with the cargo tank, the owner or operator may comply with the requirements of paragraphs (c)(2)(i) and (ii) of this section.

(i) The owner or operator may keep records of only the most recent vapor tightness test with the cargo tank, and keep records for the previous 4 years at their office or another central location.

(ii) Vapor tightness testing records that are kept at a location other than with the cargo tank must be instantly available (*e.g.,* via e-mail or facsimile) to the Administrator's delegated representative during the course of a site visit or within a mutually agreeable time frame. Such records must be an exact duplicate image of the original paper copy record with certifying signatures.

(d) Each owner or operator of an affected source under this subpart shall keep records as specified in paragraphs (d)(1) and (2) of this section.

(1) Records of the occurrence and duration of each malfunction of operation (*i.e.,* process equipment) or the air pollution control and monitoring equipment.

(2) Records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4183, Jan. 24, 2011]

§ 63.11126 What are my reporting requirements?

(a) Each owner or operator subject to the management practices in § 63.11118 shall report to the Administrator the results of all volumetric efficiency tests required under § 63.11120(b). Reports submitted under this paragraph must be submitted within 180 days of the completion of the performance testing.

(b) Each owner or operator of an affected source under this subpart shall report, by March 15 of each year, the number, duration, and a brief description of each type of malfunction which occurred during the previous calendar year and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.11115(a), including actions taken to correct a malfunction. No report is necessary for a calendar year in which no malfunctions occurred.

[76 FR 4183, Jan. 24, 2011]

Other Requirements and Information

§ 63.11130 What parts of the General Provisions apply to me?

Table 3 to this subpart shows which parts of the General Provisions apply to you.

§ 63.11131 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by the U.S. EPA or a delegated authority such as the applicable State, local, or tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to a State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or tribal agency.

(c) The authorities that cannot be delegated to State, local, or tribal agencies are as specified in paragraphs (c)(1) through (3) of this section.

(1) Approval of alternatives to the requirements in §§ 63.11116 through 63.11118 and 63.11120.

(2) Approval of major alternatives to test methods under § 63.7(e)(2)(ii) and (f), as defined in § 63.90, and as required in this subpart.

(3) Approval of major alternatives to recordkeeping and reporting under § 63.10(f), as defined in § 63.90, and as required in this subpart.

§ 63.11132 What definitions apply to this subpart?

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act (CAA), or in subparts A and BBBBBB of this part. For purposes of this subpart, definitions in this section supersede definitions in other parts or subparts.

Dual-point vapor balance system means a type of vapor balance system in which the storage tank is equipped with an entry port for a gasoline fill pipe and a separate exit port for a vapor connection.

Gasoline means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals or greater, which is used as a fuel for internal combustion engines.

Gasoline cargo tank means a delivery tank truck or railcar which is loading or unloading gasoline, or which has loaded or unloaded gasoline on the immediately previous load.

Gasoline dispensing facility (GDF) means any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. These facilities include, but are not limited to, facilities that dispense gasoline into on- and off-road, street, or highway motor vehicles, lawn equipment, boats, test engines, landscaping equipment, generators, pumps, and other gasoline-fueled engines and equipment.

Monthly throughput means the total volume of gasoline that is loaded into, or dispensed from, all gasoline storage tanks at each GDF during a month. Monthly throughput is calculated by summing the volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the current day, plus the total volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the previous 364 days, and then dividing that sum by 12.

Motor vehicle means any self-propelled vehicle designed for transporting persons or property on a street or highway.

Nonroad engine means an internal combustion engine (including the fuel system) that is not used in a motor vehicle or a vehicle used solely for competition, or that is not subject to standards promulgated under section 7411 of this title or section 7521 of this title.

Nonroad vehicle means a vehicle that is powered by a nonroad engine, and that is not a motor vehicle or a vehicle used solely for competition.

Submerged filling means, for the purposes of this subpart, the filling of a gasoline storage tank through a submerged fill pipe whose discharge is no more than the applicable distance specified in § 63.11117(b) from the bottom of the tank. Bottom filling of gasoline storage tanks is included in this definition.

Vapor balance system means a combination of pipes and hoses that create a closed system between the vapor spaces of an unloading gasoline cargo tank and a receiving storage tank such that vapors displaced from the storage tank are transferred to the gasoline cargo tank being unloaded.

Vapor-tight means equipment that allows no loss of vapors. Compliance with vapor-tight requirements can be determined by checking to ensure that the concentration at a potential leak source is not equal to or greater than 100 percent of the Lower Explosive Limit when measured with a combustible gas detector, calibrated with propane, at a distance of 1 inch from the source.

Vapor-tight gasoline cargo tank means a gasoline cargo tank which has demonstrated within the 12 preceding months that it meets the annual certification test requirements in § 63.11092(f) of this part.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4183, Jan. 24, 2011]

Table 1 to Subpart CCCCCC of Part 63—Applicability Criteria and Management Practices for Gasoline Dispensing Facilities With Monthly Throughput of 100,000 Gallons of Gasoline or More[1]

If you own or operate	Then you must
1. A new, reconstructed, or existing GDF subject to § 63.11118	Install and operate a vapor balance system on your gasoline storage tanks that meets the design criteria in paragraphs (a) through (h).
	(a) All vapor connections and lines on the storage tank shall be equipped with closures that seal upon disconnect.
	(b) The vapor line from the gasoline storage tank to the gasoline cargo tank shall be vapor-tight, as defined in § 63.11132.
	(c) The vapor balance system shall be designed such that the pressure in the tank truck does not exceed 18 inches water pressure or 5.9 inches water vacuum during product transfer.
	(d) The vapor recovery and product adaptors, and the method of connection with the delivery elbow, shall be designed so as to prevent the over-tightening or loosening of fittings during normal delivery operations.
	(e) If a gauge well separate from the fill tube is used, it shall be provided with a submerged drop tube that extends the same distance from the bottom of the storage tank as specified in § 63.11117(b).
	(f) Liquid fill connections for all systems shall be equipped with vapor-tight caps.
	(g) Pressure/vacuum (PV) vent valves shall be installed on the storage tank vent pipes. The pressure specifications for PV vent valves shall be: a positive pressure setting of 2.5 to 6.0 inches of water and a negative pressure setting of 6.0 to 10.0 inches of water. The total leak rate of all PV vent valves at an affected facility, including connections, shall not exceed 0.17 cubic foot per hour at a pressure of 2.0 inches of water and 0.63 cubic foot per hour at a vacuum of 4 inches of water.
	(h) The vapor balance system shall be capable of meeting the static pressure performance requirement of the following equation:
	$Pf = 2e^{-500.887/v}$
	Where:
	Pf = Minimum allowable final pressure, inches of water.
	v = Total ullage affected by the test, gallons.
	e = Dimensionless constant equal to approximately 2.718.
	2 = The initial pressure, inches water.
2. A new or reconstructed GDF, or any storage tank(s) constructed	Equip your gasoline storage tanks with a dual-point vapor balance system, as defined in § 63.11132, and comply with the requirements of item 1 in this Table.

If you own or operate	Then you must
after November 9, 2006, at an existing affected facility subject to § 63.11118	

[1] The management practices specified in this Table are not applicable if you are complying with the requirements in § 63.11118(b)(2), except that if you are complying with the requirements in § 63.11118(b)(2)(i)(B), you must operate using management practices at least as stringent as those listed in this Table.

[73 FR 1945, Jan. 10, 2008, as amended at 73 FR 35944, June 25, 2008; 76 FR 4184, Jan. 24, 2011]

Table 2 to Subpart CCCCCC of Part 63—Applicability Criteria and Management Practices for Gasoline Cargo Tanks Unloading at Gasoline Dispensing Facilities With Monthly Throughput of 100,000 Gallons of Gasoline or More

If you own or operate	Then you must
A gasoline cargo tank	Not unload gasoline into a storage tank at a GDF subject to the control requirements in this subpart unless the following conditions are met:
	(i) All hoses in the vapor balance system are properly connected,
	(ii) The adapters or couplers that attach to the vapor line on the storage tank have closures that seal upon disconnect,
	(iii) All vapor return hoses, couplers, and adapters used in the gasoline delivery are vapor-tight,
	(iv) All tank truck vapor return equipment is compatible in size and forms a vapor-tight connection with the vapor balance equipment on the GDF storage tank, and
	(v) All hatches on the tank truck are closed and securely fastened.
	(vi) The filling of storage tanks at GDF shall be limited to unloading from vapor-tight gasoline cargo tanks. Documentation that the cargo tank has met the specifications of EPA Method 27 shall be carried with the cargo tank, as specified in § 63.11125(c).

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4184, Jan. 24, 2011]

Table 3 to Subpart CCCCCC of Part 63—Applicability of General Provisions

Citation	Subject	Brief description	Applies to subpart CCCCCC
§ 63.1	Applicability	Initial applicability determination; applicability after standard established; permit requirements; extensions, notifications	Yes, specific requirements given in § 63.11111.
§ 63.1(c)(2)	Title V Permit	Requirements for obtaining a title V permit from the applicable permitting authority	Yes, § 63.11111(f) of subpart CCCCCC exempts identified area sources from the obligation to obtain title V operating permits.
§ 63.2	Definitions	Definitions for part 63 standards	Yes, additional definitions in § 63.11132.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§ 63.3	Units and Abbreviations	Units and abbreviations for part 63 standards	Yes.
§ 63.4	Prohibited Activities and Circumvention	Prohibited activities; Circumvention, severability	Yes.
§ 63.5	Construction/Reconstruction	Applicability; applications; approvals	Yes, except that these notifications are not required for facilities subject to § 63.11116
§ 63.6(a)	Compliance with Standards/Operation & Maintenance—Applicability	General Provisions apply unless compliance extension; General Provisions apply to area sources that become major	Yes.
§ 63.6(b)(1)-(4)	Compliance Dates for New and Reconstructed Sources	Standards apply at effective date; 3 years after effective date; upon startup; 10 years after construction or reconstruction commences for CAA section 112(f)	Yes.
§ 63.6(b)(5)	Notification	Must notify if commenced construction or reconstruction after proposal	Yes.
§ 63.6(b)(6)	[Reserved]		
§ 63.6(b)(7)	Compliance Dates for New and Reconstructed Area Sources That Become Major	Area sources that become major must comply with major source standards immediately upon becoming major, regardless of whether required to comply when they were an area source	No.
§ 63.6(c)(1)-(2)	Compliance Dates for Existing Sources	Comply according to date in this subpart, which must be no later than 3 years after effective date; for CAA section 112(f) standards, comply within 90 days of effective date unless compliance extension	No, § 63.11113 specifies the compliance dates.
§ 63.6(c)(3)-(4)	[Reserved]		
§ 63.6(c)(5)	Compliance Dates for Existing Area Sources That Become Major	Area sources That become major must comply with major source standards by date indicated in this subpart or by equivalent time period (e.g., 3 years)	No.
§ 63.6(d)	[Reserved]		
63.6(e)(1)(i)	General duty to minimize emissions	Operate to minimize emissions at all times; information Administrator will use to determine if operation and maintenance requirements were met.	No.*See*§ 63.11115 for general duty requirement.
63.6(e)(1)(ii)	Requirement to correct malfunctions ASAP	Owner or operator must correct malfunctions as soon as possible.	No.
§ 63.6(e)(2)	[Reserved]		
§ 63.6(e)(3)	Startup, Shutdown, and Malfunction (SSM) Plan	Requirement for SSM plan; content of SSM plan; actions during SSM	No.
§ 63.6(f)(1)	Compliance Except During SSM	You must comply with emission standards at all times except during SSM	No.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§ 63.6(f)(2)-(3)	Methods for Determining Compliance	Compliance based on performance test, operation and maintenance plans, records, inspection	Yes.
§ 63.6(g)(1)-(3)	Alternative Standard	Procedures for getting an alternative standard	Yes.
§ 63.6(h)(1)	Compliance with Opacity/Visible Emission (VE) Standards	You must comply with opacity/VE standards at all times except during SSM	No.
§ 63.6(h)(2)(i)	Determining Compliance with Opacity/VE Standards	If standard does not State test method, use EPA Method 9 for opacity in appendix A of part 60 of this chapter and EPA Method 22 for VE in appendix A of part 60 of this chapter	No.
§ 63.6(h)(2)(ii)	[Reserved]		
§ 63.6(h)(2)(iii)	Using Previous Tests To Demonstrate Compliance With Opacity/VE Standards	Criteria for when previous opacity/VE testing can be used to show compliance with this subpart	No.
§ 63.6(h)(3)	[Reserved]		
§ 63.6(h)(4)	Notification of Opacity/VE Observation Date	Must notify Administrator of anticipated date of observation	No.
§ 63.6(h)(5)(i), (iii)-(v)	Conducting Opacity/VE Observations	Dates and schedule for conducting opacity/VE observations	No.
§ 63.6(h)(5)(ii)	Opacity Test Duration and Averaging Times	Must have at least 3 hours of observation with 30 6-minute averages	No.
§ 63.6(h)(6)	Records of Conditions During Opacity/VE Observations	Must keep records available and allow Administrator to inspect	No.
§ 63.6(h)(7)(i)	Report Continuous Opacity Monitoring System (COMS) Monitoring Data From Performance Test	Must submit COMS data with other performance test data	No.
§ 63.6(h)(7)(ii)	Using COMS Instead of EPA Method 9	Can submit COMS data instead of EPA Method 9 results even if rule requires EPA Method 9 in appendix A of part 60 of this chapter, but must notify Administrator before performance test	No.
§ 63.6(h)(7)(iii)	Averaging Time for COMS During Performance Test	To determine compliance, must reduce COMS data to 6-minute averages	No.
§ 63.6(h)(7)(iv)	COMS Requirements	Owner/operator must demonstrate that COMS performance evaluations are conducted according to § 63.8(e); COMS are properly maintained and operated according to § 63.8(c) and data quality as § 63.8(d)	No.
§ 63.6(h)(7)(v)	Determining Compliance with Opacity/VE Standards	COMS is probable but not conclusive evidence of compliance with opacity standard, even if EPA Method 9 observation shows otherwise.	No.

Citation	Subject	Brief description	Applies to subpart CCCCCC
		Requirements for COMS to be probable evidence-proper maintenance, meeting Performance Specification 1 in appendix B of part 60 of this chapter, and data have not been altered	
§ 63.6(h)(8)	Determining Compliance with Opacity/VE Standards	Administrator will use all COMS, EPA Method 9 (in appendix A of part 60 of this chapter), and EPA Method 22 (in appendix A of part 60 of this chapter) results, as well as information about operation and maintenance to determine compliance	No.
§ 63.6(h)(9)	Adjusted Opacity Standard	Procedures for Administrator to adjust an opacity standard	No.
§ 63.6(i)(1)-(14)	Compliance Extension	Procedures and criteria for Administrator to grant compliance extension	Yes.
§ 63.6(j)	Presidential Compliance Exemption	President may exempt any source from requirement to comply with this subpart	Yes.
§ 63.7(a)(2)	Performance Test Dates	Dates for conducting initial performance testing; must conduct 180 days after compliance date	Yes.
§ 63.7(a)(3)	CAA Section 114 Authority	Administrator may require a performance test under CAA section 114 at any time	Yes.
§ 63.7(b)(1)	Notification of Performance Test	Must notify Administrator 60 days before the test	Yes.
§ 63.7(b)(2)	Notification of Re-scheduling	If have to reschedule performance test, must notify Administrator of rescheduled date as soon as practicable and without delay	Yes.
§ 63.7(c)	Quality Assurance (QA)/Test Plan	Requirement to submit site-specific test plan 60 days before the test or on date Administrator agrees with; test plan approval procedures; performance audit requirements; internal and external QA procedures for testing	Yes.
§ 63.7(d)	Testing Facilities	Requirements for testing facilities	Yes.
63.7(e)(1)	Conditions for Conducting Performance Tests	Performance test must be conducted under representative conditions	No, § 63.11120(c) specifies conditions for conducting performance tests.
§ 63.7(e)(2)	Conditions for Conducting Performance Tests	Must conduct according to this subpart and EPA test methods unless Administrator approves alternative	Yes.
§ 63.7(e)(3)	Test Run Duration	Must have three test runs of at least 1 hour each; compliance is based on arithmetic mean of three runs; conditions when data from an additional test run can be used	Yes.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§ 63.7(f)	Alternative Test Method	Procedures by which Administrator can grant approval to use an intermediate or major change, or alternative to a test method	Yes.
§ 63.7(g)	Performance Test Data Analysis	Must include raw data in performance test report; must submit performance test data 60 days after end of test with the Notification of Compliance Status;	Yes
§ 63.7(h)	Waiver of Tests	Procedures for Administrator to waive performance test	Yes.
§ 63.8(a)(1)	Applicability of Monitoring Requirements	Subject to all monitoring requirements in standard	Yes.
§ 63.8(a)(2)	Performance Specifications	Performance Specifications in appendix B of 40 CFR part 60 apply	Yes.
§ 63.8(a)(3)	[Reserved]		
§ 63.8(a)(4)	Monitoring of Flares	Monitoring requirements for flares in § 63.11 apply	Yes.
§ 63.8(b)(1)	Monitoring	Must conduct monitoring according to standard unless Administrator approves alternative	Yes.
§ 63.8(b)(2)-(3)	Multiple Effluents and Multiple Monitoring Systems	Specific requirements for installing monitoring systems; must install on each affected source or after combined with another affected source before it is released to the atmosphere provided the monitoring is sufficient to demonstrate compliance with the standard; if more than one monitoring system on an emission point, must report all monitoring system results, unless one monitoring system is a backup	No.
§ 63.8(c)(1)	Monitoring System Operation and Maintenance	Maintain monitoring system in a manner consistent with good air pollution control practices	No.
§ 63.8(c)(1)(i)-(iii)	Operation and Maintenance of Continuous Monitoring Systems (CMS)	Must maintain and operate each CMS as specified in § 63.6(e)(1); must keep parts for routine repairs readily available; must develop a written SSM plan for CMS, as specified in § 63.6(e)(3)	No.
§ 63.8(c)(2)-(8)	CMS Requirements	Must install to get representative emission or parameter measurements; must verify operational status before or at performance test	No.
§ 63.8(d)	CMS Quality Control	Requirements for CMS quality control, including calibration, etc.; must keep quality control plan on record for 5 years; keep old versions for 5 years after revisions	No.
§ 63.8(e)	CMS Performance Evaluation	Notification, performance evaluation test	No.

Citation	Subject	Brief description	Applies to subpart CCCCCC
		plan, reports	
§ 63.8(f)(1)-(5)	Alternative Monitoring Method	Procedures for Administrator to approve alternative monitoring	No.
§ 63.8(f)(6)	Alternative to Relative Accuracy Test	Procedures for Administrator to approve alternative relative accuracy tests for continuous emissions monitoring system (CEMS)	No.
§ 63.8(g)	Data Reduction	COMS 6-minute averages calculated over at least 36 evenly spaced data points; CEMS 1 hour averages computed over at least 4 equally spaced data points; data that cannot be used in average	No.
§ 63.9(a)	Notification Requirements	Applicability and State delegation	Yes.
§ 63.9(b)(1)-(2), (4)-(5)	Initial Notifications	Submit notification within 120 days after effective date; notification of intent to construct/reconstruct, notification of commencement of construction/reconstruction, notification of startup; contents of each	Yes.
§ 63.9(c)	Request for Compliance Extension	Can request if cannot comply by date or if installed best available control technology or lowest achievable emission rate	Yes.
§ 63.9(d)	Notification of Special Compliance Requirements for New Sources	For sources that commence construction between proposal and promulgation and want to comply 3 years after effective date	Yes.
§ 63.9(e)	Notification of Performance Test	Notify Administrator 60 days prior	Yes.
§ 63.9(f)	Notification of VE/Opacity Test	Notify Administrator 30 days prior	No.
§ 63.9(g)	Additional Notifications when Using CMS	Notification of performance evaluation; notification about use of COMS data; notification that exceeded criterion for relative accuracy alternative	Yes, however, there are no opacity standards.
§ 63.9(h)(1)-(6)	Notification of Compliance Status	Contents due 60 days after end of performance test or other compliance demonstration, except for opacity/VE, which are due 30 days after; when to submit to Federal vs. State authority	Yes, however, there are no opacity standards.
§ 63.9(i)	Adjustment of Submittal Deadlines	Procedures for Administrator to approve change when notifications must be submitted	Yes.
§ 63.9(j)	Change in Previous Information	Must submit within 15 days after the change	Yes.
§ 63.10(a)	Recordkeeping/Reporting	Applies to all, unless compliance extension; when to submit to Federal vs. State authority; procedures for owners of more than one source	Yes.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§ 63.10(b)(1)	Recordkeeping/Reporting	General requirements; keep all records readily available; keep for 5 years	Yes.
§ 63.10(b)(2)(i)	Records related to SSM	Recordkeeping of occurrence and duration of startups and shutdowns	No.
§ 63.10(b)(2)(ii)	Records related to SSM	Recordkeeping of malfunctions	No.*See* § 63.11125(d) for recordkeeping of (1) occurrence and duration and (2) actions taken during malfunction.
§ 63.10(b)(2)(iii)	Maintenance records	Recordkeeping of maintenance on air pollution control and monitoring equipment	Yes.
§ 63.10(b)(2)(iv)	Records Related to SSM	Actions taken to minimize emissions during SSM	No.
§ 63.10(b)(2)(v)	Records Related to SSM	Actions taken to minimize emissions during SSM	No.
§ 63.10(b)(2)(vi)-(xi)	CMS Records	Malfunctions, inoperative, out-of-control periods	No.
§ 63.10(b)(2)(xii)	Records	Records when under waiver	Yes.
§ 63.10(b)(2)(xiii)	Records	Records when using alternative to relative accuracy test	Yes.
§ 63.10(b)(2)(xiv)	Records	All documentation supporting Initial Notification and Notification of Compliance Status	Yes.
§ 63.10(b)(3)	Records	Applicability determinations	Yes.
§ 63.10(c)	Records	Additional records for CMS	No.
§ 63.10(d)(1)	General Reporting Requirements	Requirement to report	Yes.
§ 63.10(d)(2)	Report of Performance Test Results	When to submit to Federal or State authority	Yes.
§ 63.10(d)(3)	Reporting Opacity or VE Observations	What to report and when	No.
§ 63.10(d)(4)	Progress Reports	Must submit progress reports on schedule if under compliance extension	Yes.
§ 63.10(d)(5)	SSM Reports	Contents and submission	No.*See* § 63.11126(b) for malfunction reporting requirements.
§ 63.10(e)(1)-(2)	Additional CMS Reports	Must report results for each CEMS on a unit; written copy of CMS performance evaluation; two-three copies of COMS performance evaluation	No.
§ 63.10(e)(3)(i)-(iii)	Reports	Schedule for reporting excess emissions	No.
§ 63.10(e)(3)(iv)-	Excess Emissions Reports	Requirement to revert to quarterly	No.

Citation	Subject	Brief description	Applies to subpart CCCCCC
(v)		submission if there is an excess emissions and parameter monitor exceedances (now defined as deviations); provision to request semiannual reporting after compliance for 1 year; submit report by 30th day following end of quarter or calendar half; if there has not been an exceedance or excess emissions (now defined as deviations), report contents in a statement that there have been no deviations; must submit report containing all of the information in §§ 63.8(c)(7)-(8) and 63.10(c)(5)-(13)	
§ 63.10(e)(3)(iv)-(v)	Excess Emissions Reports	Requirement to revert to quarterly submission if there is an excess emissions and parameter monitor exceedances (now defined as deviations); provision to request semiannual reporting after compliance for 1 year; submit report by 30th day following end of quarter or calendar half; if there has not been an exceedance or excess emissions (now defined as deviations), report contents in a statement that there have been no deviations; must submit report containing all of the information in §§ 63.8(c)(7)-(8) and 63.10(c)(5)-(13)	No, § 63.11130(K) specifies excess emission events for this subpart.
§ 63.10(e)(3)(vi)-(viii)	Excess Emissions Report and Summary Report	Requirements for reporting excess emissions for CMS; requires all of the information in §§ 63.10(c)(5)-(13) and 63.8(c)(7)-(8)	No.
§ 63.10(e)(4)	Reporting COMS Data	Must submit COMS data with performance test data	No.
§ 63.10(f)	Waiver for Recordkeeping/Reporting	Procedures for Administrator to waive	Yes.
§ 63.11(b)	Flares	Requirements for flares	No.
§ 63.12	Delegation	State authority to enforce standards	Yes.
§ 63.13	Addresses	Addresses where reports, notifications, and requests are sent	Yes.
§ 63.14	Incorporations by Reference	Test methods incorporated by reference	Yes.
§ 63.15	Availability of Information	Public and confidential information	Yes.

[73 FR 1945, Jan. 10, 2008, as amended at 76 FR 4184, Jan. 24, 2011]

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a Minor Source Operating Permit (MSOP) Renewal

Source Background and Description

Source Name:	**Gavilon Grain, LLC**
Source Location:	**7646 North County Road 125 East, Shelburn, Indiana 47879**
County:	**Sullivan**
SIC Code:	**5153 (Grain and Field Beans)**
Renewal Operation Permit No.:	**M153-32926-00038**
Permit Reviewer:	**Charles Sullivan**

On June 27, 2013, the Office of Air Quality (OAQ) had a notice published in Sullivan Daily Times, Sullivan, Indiana, stating that Gavilon Grain, LLC had applied for a MSOP Renewal to the operation of a grain receiving, handling, drying, storage, and shipping facility. The notice also stated that the OAQ proposed to issue a MSOP Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On July 22, 2013, Gavilon Grain, LLC submitted comments to IDEM, OAQ on the draft MSOP Renewal.

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

Comment 1:

Permit Condition E.1.2. states "the Permittee, which owns and operates an existing gasoline dispensing facility at an area source of HAPs, shall comply with the following provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment B of this permit)." Gavilon believes the reference should be to Attachment A, since the NESHAP Subpart CCCCCC attachment in the draft permit is labeled as "Attachment A."

Response to Comment 1:

See the permit changes included in Response to Comment 3 below.

Comment 2:

Gavilon requests the following changes to pages 2 and 3 of the Technical Support Document, to be consistent with the permit conditions in the draft permit:

...

(d) One (1) Storage system, identified as STORAGE, constructed in 1972 and approved for modification in 2009, with emissions exhausting to the atmosphere, and consisting of the following:

(1) Four (4) metal storage tanks, identified as SE (T3), NE (T4), SW (T13), and NW (T14), constructed in 1987, with a combined storage capacity of 126,740 bushels (3802 tons) and a maximum ~~unload~~ capacity of 6,000 bushels per hour (180 tons/hr). Each of these four tanks are vented to the atmosphere, with each tank having four vents labeled a, b, c, and d, respectively. SE (T3) & NE (T4) have truck loadout spouts.

(3) One (1) metal storage tank, identified as BROCK (T18), constructed in 1987, with storage capacity of 273,198 bushels (8196 tons) and a maximum ~~unload~~ capacity of 10,000 bushels per hour (300 tons/hr), vented to the atmosphere through ten vents, identified as vents 18 a-j.

(4) Three (3) concrete silos, identified as B1 (S10), B2 (S11), B3 (S12) constructed in 1977, with a combined storage capacity of 303,464 bushels (9104 tons) and a maximum ~~unload~~ capacity of 30,000 bushels per hour (900 tons/hr), vented to the atmosphere through vents 10a & b, 11a & b, and 12a &b, respectively. Silos B1, B2, and B3 have truck loadout spouts.

(7) One (1) over head storage tank, identified as West (T8), constructed in 1972, with total storage capacity of 21,381 bushels, with a maximum ~~through put~~ of 2,000 bushels per hour (60 tons/hr), and exhausting through vent (8a) to the atmosphere.

...

Response to Comment 2:

IDEM, OAQ does not make any changes to the original Technical Support Document (TSD). No changes were made to the permit as a result of this comment since the existing permit language reflects the sources requested changes to the TSD.

Comment 3:

As listed in the facility's current Minor Source Operating permit, one of the temporary ground storage piles foundations at the Gavilon facility in Shelburn has a concrete surface and the other has an asphalt surface. Both piles are covered by tarpaulin and utilize fixed conveyors to fill the piles. Information not listed in the current permit includes the use of rigid/removable sidewalls and a front end loader to pick up grain from the piles.

In the NSPS applicability discussion on page 6 of 11 in the Technical Support Document, Gavilon agrees that the temporary ground storage piles at the Gavilon facility in Shelburn are "non-permanent" according to the definition listed in 40 CFR 60 Subpart DD (40 CFR 60.301(d)). Gavilon, along with other grain companies, does not agree with the findings in the November 21, 2007 memorandum cited in the Note, which designates temporary ground storage piles as "permanent" storage if piles are designed with permanent structural features such as asphalt or concrete foundations, rigid sidewalls, long-lasting tarp covers, and permanent conveyor systems.

The inclusion of the Note in the NSPS applicability discussion for the Gavilon facility in Shelburn seems to contradict the determination that the piles are classified as "non-permanent". Gavilon proposes that the Note paragraph be deleted. Upon reviewing this information, if IDEM does not agree with Gavilon's interpretation that temporary ground storage piles should be classified as "non-permanent" storage, then Gavilon requests that IDEM include language in the permit that would allow for modification / removal of Subpart DD requirements at the time EPA rescinds the November 21, 2007 memorandum.

Gavilon is also concerned about the retrospective impacts of NSPS determinations including temporary ground pile storage as "permanent" (i.e. when did/do the Subpart DD requirements "take effect"?) and compliance obligations in regard to previously permitted storage piles.

Response to Comment 3:

IDEM, OAQ does not make any changes to the original TSD.

As indicated in the November 21, 2007 memorandum from Michael S. Alushin, Director, Compliance Assessment and Media Programs Division, Office of Compliance, United States Environmental Protection Agency (U.S. EPA), 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.

The temporary outdoor storage pile, identified as WEST PAD (XT2) has a concrete foundation, is covered by tarpaulin, includes the use of rigid/removable sidewalls, and utilizes fixed conveyors. Therefore, when determining whether Subpart DD applies, the source must include the grain storage capacity of XT2. In 1972, when WEST PAD (XT2) was constructed, the source-wide storage capacity was less than 2.5 million bushels. Therefore, the requirements of 40 CFR 60, Subpart DD are not applicable to WEST PAD (XT2).

The temporary outdoor storage pile, identified as EAST PAD (XT4), which was previously identified as EAST PAD (XT9), has an asphalt foundation, is covered by tarpaulin, includes the use of rigid/removable sidewalls, and utilizes fixed conveyors. Therefore, when determining whether Subpart DD applies, the source must include the grain storage capacity of XT4. When EAST PAD (XT4) (previously identified as XT9) was constructed in 2006, it caused the source-wide storage capacity to exceed 2.5 million bushels. Therefore, the requirements of 40 CFR 60, Subpart DD are applicable to EAST PAD (XT4) and to any grain handling operations constructed and/or modified after the source-wide storage capacity exceeded 2.5 million bushels (2006), except as otherwise specified in 40 CFR 60.304.

The facilities subject to 40 CFR 60, Subpart DD include the following:

(1) The following emission units comprising the one (1) internal handling operation, identified as Grain Conveying:

Emissions Unit Description	Year Constructed	Maximum (bushels/hr)
40,000 Belt Conveyor (B1)	2006	40,000
East Pad Belt Conveyor (B2)	2006	20,000
Pit Drag Conveyor 3 (D3)	2007	10,000
Bin 1 Reclaim Conveyor (D17)	2009	7,500
Bin 2 Reclaim Conveyor (D18)	2009	7,500
B-Bin Top Fill Drag Conveyor (D19)	2008	30,000
Big Tank Conveyor 2 (D20)	2010	10,000
Loadout Conveyor (D21)	2008	10,000

(2) One (1) temporary outdoor storage pile, on an asphalt surface, covered by tarpaulin, identified as EAST PAD (XT4), with a capacity of 1,666,000 bushels of grain (49,980 tons), constructed in 2006, with dimensions of 185 feet x 500 feet.

(3) One (1) steel storage tank, constructed in 2009, identified as Bin 2, with total storage capacity of 27,286 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

(4) One (1) steel storage tank, constructed in 2009, identified as Bin 1**,** with total storage capacity of 21,631 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and with a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

(5) One (1) Bulk Weigh Rail loadout system rated at 40,000 bushels per hour (1,200 tons/hr) with telescoping spouts, constructed in 2009.

Applicable portions of the NSPS are the following:

(1) 40 CFR 60.300(a) and (b)
(2) 40 CFR 60.301
(3) 40 CFR 60.302(b) and (c)(1) through (3)
(4) 40 CFR 60.303

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

Since there is an applicable New Source Performance Standard (NSPS DD) that was in effect on August 7, 1980, fugitive emissions are counted toward the determination of PSD and Part 70 Permit applicability. Based on the revised PTE calculations included as Appendix A to the Addendum of the Technical Support Document (ATSD), the combined non-fugitive and fugitive potential to emit particulate matter (PM) is still less than 250 tons per twelve consecutive month period and the combined non-fugitive and fugitive potentials to emit PM10 and PM2.5 are each less than 100 tons per twelve consecutive month period. Therefore, there are no changes to PSD and/or Part 70 rule applicability. The source should maintain its previous records relating to the storage piles in the event that the U.S. EPA has any questions regarding any past compliance obligations.

If the U.S. EPA rescinds the November 21, 2007 memorandum and/or promulgates revisions to 40 CFR 60, Subpart DD clarifying the definition of "permanent storage capacity", the source can submit a permit application for a permit revision for the incorporation or deletion of applicable requirements as a result of a change in applicability.

The following changes have been made to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

...

A.2 Emission Units and Pollution Control Equipment Summary

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

...

(c) One (1) internal handling operation, identified as Grain Conveying, with a maximum capacity of 54,700 bushels per hour (1,641 tons per hour), constructed between 1962 and 2010, consisting of bucket elevators (legs), drag conveyors, belt conveyors, distributors and augers, consisting of the following:

Emissions Unit Description	Year Constructed	Maximum (bushels/hr)
40,000 Belt Conveyor (B1)*****	2006	40,000
...		
East Pad Belt Conveyor (B2)*****	2006	20,000
...		
Pit Drag Conveyor 3 (D3)*****	2007	10,000
...		
Bin 1 Reclaim Conveyor (D17)*****	2009	7,500
Bin 2 Reclaim Conveyor (D18)*****	2009	7,500
B-Bin Top Fill Drag Conveyor (D19)*****	2008	30,000
Big Tank Conveyor 2 (D20)*****	2010	10,000
Loadout Conveyor (D21)*****	2008	10,000
...		
Portable Belt Loader	2002	5,000

Note: Emissions units marked with an asterisk ("*") are considered affected facilities under 40 CFR 60, Subpart DD.

...

(d) One (1) Storage system, identified as STORAGE, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, and consisting of the following:

...

(6) One (1) temporary outdoor storage pile, on a**n asphalt** ~~gravel~~ surface, covered by tarpaulin, identified as EAST PAD (XT4), with a capacity of 1,666,000 bushels of grain (49,980 tons), constructed in 2006, with dimensions of 185 feet x 500 feet.

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

...

(8) One (1) steel storage tank, constructed in 2009, identified as Bin 2, with total storage capacity of 27,286 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

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

(9) One (1) steel storage tank, constructed in 2009, identified as Bin 1**,** with total storage capacity of 21,631 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and with a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

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

...

(e) One (1) grain loadout operation, identified as SHIPPING, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, consisting of the following:

...

(4) One (1) Bulk Weigh Rail loadout system rated at 40,000 bushels per hour (1,200 tons/hr) with telescoping spouts, constructed in 2009.

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

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]: Grain Processing And Storage

...

(c) One (1) internal handling operation, identified as Grain Conveying, with a maximum capacity of 54,700 bushels per hour (1,641 tons per hour), constructed between 1962 and 2010, consisting of bucket elevators (legs), drag conveyors, belt conveyors, distributors and augers, consisting of the following:

Emissions Unit Description	Year Constructed	Maximum (bushels/hr)
40,000 Belt Conveyor (B1)*****	2006	40,000
...		
East Pad Belt Conveyor (B2)*****	2006	20,000
...		
Pit Drag Conveyor 3 (D3)*****	2007	10,000
...		
Bin 1 Reclaim Conveyor (D17)*****	2009	7,500
Bin 2 Reclaim Conveyor (D18)*****	2009	7,500
B-Bin Top Fill Drag Conveyor (D19)*****	2008	30,000
Big Tank Conveyor 2 (D20)*****	2010	10,000
Loadout Conveyor (D21)*****	2008	10,000
...		
Portable Belt Loader	2002	5,000

Note: Emissions units marked with an asterisk ("*") are considered affected facilities under 40 CFR 60, Subpart DD.

(d) One (1) Storage system, identified as STORAGE, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, and consisting of the following:

...

(6) One (1) temporary outdoor storage pile, on a**n asphalt** ~~gravel~~ surface, covered by tarpaulin, identified as EAST PAD (XT4), with a capacity of 1,666,000 bushels of grain (49,980 tons), constructed in 2006, with dimensions of 185 feet x 500 feet.

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

...

(8) One (1) steel storage tank, constructed in 2009, identified as Bin 2, with total storage capacity of 27,286 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

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

(9) One (1) steel storage tank, constructed in 2009, identified as Bin 1, with total storage capacity of 21,631 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and with a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

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

(e) One (1) grain loadout operation, identified as SHIPPING, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, consisting of the following:
...

(4) One (1) Bulk Weigh Rail loadout system rated at 40,000 bushels per hour (1,200 tons/hr) with telescoping spouts, constructed in 2009.

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

...

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

...

SECTION E.1 FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]: Grain Processing And Storage

(a) One (1) enclosed grain receiving operation, identified as RECEIVING, constructed in 1972 and approved for modification in 2009, and consisting of the following:

(1) One (1) truck dump pit, identified as Pit #1 (P1), with a maximum capacity of 20,000 bushels per hour (600 tons/hr), equipped with a baffle for particulate control.

(2) One (1) truck dump pit, identified as Pit #2 (P2), with a maximum capacity of 20,000 bushels per hour (600 tons/hr), equipped with a baffle for particulate control.

(3) One (1) truck dump pit, identified as Pit #3 (P3), with a maximum capacity of 10,000 bushels per hour (300 tons/hr), with emissions exhausted to the atmosphere.

(b) One (1) column grain dryer, with a natural gas-fired, low emission cyclone burner, identified as DRYER1, constructed in 1998, with a plate perforation diameter of 0.07 inches, with a maximum heat input capacity of 41.96 MMBtu/hr and a maximum throughput rate of 4,700 bushels of grain per hour (140 tons/hr). The dryer is loaded by the Wet Leg (L6) & emptied by the Dry Leg (L7).

(c) One (1) internal handling operation, identified as Grain Conveying, with a maximum capacity of 54,700 bushels per hour (1,641 tons per hour), constructed between 1962 and 2010, consisting of bucket elevators (legs), drag conveyors, belt conveyors, distributors and augers, consisting of the following:

Emissions Unit Description	Year Constructed	Maximum (bushels/hr)
40,000 Belt Conveyor (B1)	2006	40,000
B Bin South Bottom Drag Conveyor (D7)	2003	20,000
B Bin North Bottom Drag Conveyor (D6)	2003	20,000
East Pad Belt Conveyor (B2)*	2006	20,000
Leg 1 (L1)	2001	20,000
Pit Drag Conveyor 1 (D1)	2001	20,000

Pit Drag Conveyor 3 (D3)*	**2007**	**10,000**
Brock Drag Conveyor (D9)	**1972**	**10,000**
Brock Reclaim Conveyor (D16)	**1987**	**10,000**
Leg 2 (L2)	**1972**	**20,000**
Pit Drag Conveyor 2 (D2)	**1972**	**20,000**
Dry Leg (L7)	**1998**	**8,000**
Big Tank Belt Conveyor (B3)	**1972**	**8,000**
Big Tank Conveyor 1 (D15)	**1990**	**8,000**
Leg 3 (L3)	**1972**	**10,000**
Wet Leg (L6)	**1998**	**6,000**
NE Drag Conveyor (D13)	**1972**	**6,000**
SE Drag Conveyor (D12)	**1972**	**6,000**
NW Drag Conveyor (D11)	**1972**	**6,000**
SW Drag Conveyor (D10)	**1972**	**6,000**
B Bin Auger (A1)	**1972**	**4,000**
SW Pad Auger (A3)	**1972**	**3,500**
NW Pad Auger (A2)	**1972**	**3,500**
Bin 1 Reclaim Conveyor (D17)*	**2009**	**7,500**
Bin 2 Reclaim Conveyor (D18)*	**2009**	**7,500**
B-Bin Top Fill Drag Conveyor (D19)*	**2008**	**30,000**
Big Tank Conveyor 2 (D20)*	**2010**	**10,000**
Loadout Conveyor (D21)*	**2008**	**10,000**
Dryer Reclaim Drag Conveyor (D22)	**1998**	**6,000**
Jump Drag Conveyor (D23)	**1998**	**10,000**
Long Belt Conveyor (B4)	**1990**	**10,000**
Short Belt Conveyor (B5)	**1990**	**10,000**
Portable Belt Conveyor	**2005**	**7,000**
Portable Belt Loader	**2002**	**5,000**

Note: Emissions units marked with an asterisk ("*") are considered affected facilities under 40 CFR 60, Subpart DD.

(d) One (1) Storage system, identified as STORAGE, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, and consisting of the following:

(1) Four (4) metal storage tanks, identified as SE (T3), NE (T4), SW (T13), and NW (T14), constructed in 1987, with a combined storage capacity of 126,740 bushels (3802 tons) and a maximum fill capacity of 10,000 bushels per hour (300 tons/hr). Each of these four tanks are vented to the atmosphere, with each tank having four vents labeled a, b, c, and d, respectively. SE (T3) & NE (T4) have truck loadout spouts.

(2) One (1) metal storage tank, identified as the BIG TANK (T5), constructed in 1972, with storage capacity of 353,489 bushels (10,605 tons), a maximum fill capacity of 40,000 bushels per hour (1200 tons/hr) and a maximum unload capacity of 8,000 bushels per hour (240 tons/hr), vented to the atmosphere through vent 5a & 5b. The BIG TANK (T5) has a truck loadout spout.

(3) One (1) metal storage tank, identified as BROCK (T18), constructed in 1987, with storage capacity of 273,198 bushels (8196 tons) and a maximum fill capacity of

10,000 bushels per hour (300 tons/hr), vented to the atmosphere through ten vents, identified as vents 18 a-j.

(4) Three (3) concrete silos, identified as B1 (S10), B2 (S11), B3 (S12) constructed in 1977, with a combined storage capacity of 303,464 bushels (9104 tons) and a maximum fill capacity of 30,000 bushels per hour (900 tons/hr), vented to the atmosphere through vents 10a & b, 11a & b, and 12a &b, respectively. Silos B1, B2, and B3 have truck loadout spouts.

(5) One (1) temporary outdoor storage pile, on a concrete surface, covered by tarpaulin, identified as WEST PAD (XT2), with a capacity of 1,001,000 bushels of grain (30,030 tons), constructed in 1972, with dimensions of 145 feet x 500 feet.

(6) One (1) temporary outdoor storage pile, on an asphalt surface, covered by tarpaulin, identified as EAST PAD (XT4), with a capacity of 1,666,000 bushels of grain (49,980 tons), constructed in 2006, with dimensions of 185 feet x 500 feet.

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

(7) One (1) over head storage tank, identified as West (T8), constructed in 1972, with total storage capacity of 21,381 bushels, with a maximum fill capacity of 20,000 bushels per hour (60 tons/hr), and exhausting through vent (8a) to the atmosphere.

(8) One (1) steel storage tank, constructed in 2009, identified as Bin 2, with total storage capacity of 27,286 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

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

(9) One (1) steel storage tank, constructed in 2009, identified as Bin 1, with total storage capacity of 21,631 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and with a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

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

(e) One (1) grain loadout operation, identified as SHIPPING, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, consisting of the following:

(1) One (1) truck loadout bin, identified as 1L, with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(2) Eleven (11) side draw truck loadout spouts, each with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(3) One (1) steel overhead loadout bin, identified as #3 OVERHEAD Tank (T17), constructed in 1972, and a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr), equipped with a loadout spout, with a storage capacity of 1,989 bushels (60 tons).

(4) One (1) Bulk Weigh Rail loadout system rated at 40,000 bushels per hour (1,200 tons/hr) with telescoping spouts, constructed in 2009.

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

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

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

(a) The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the affected facilities comprising the grain handling operations, except when otherwise specified in 40 CFR 60, Subpart DD.

(b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:
Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.1.2 New Source Performance Standards (NSPS) for Grain Elevators [40 CFR 60, Subpart DD] [326 IAC 12]

The Permittee, which operates a grain storage elevator which commenced construction after August 3, 1978, shall comply with the following provisions of 40 CFR Part 60, Subpart DD, (included as Attachment B of this permit) which are incorporated by reference as 326 IAC 12, except as otherwise specified in 40 CFR 60, Subpart DD.

This source is subject to the following portions of Subpart DD.

(1) 40 CFR 60.300
(2) 40 CFR 60.301
(3) 40 CFR 60.302(b) and (c)(1) through (3)
(4) 40 CFR 60.303
(5) 40 CFR 60.304

Compliance Determination Requirements

E.1.3 Testing Requirements [326 IAC 2-1.1-11]

Not later than 180 days of after issuance of MSOP Renewal No. M153-32926-00038, in order to comply with Condition E.2.2, the Permittee shall perform the performance testing required under NSPS 40 CFR 60, Subpart DD, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

...

SECTION E.~~1~~**2** ~~EMISSIONS UNIT~~ **FACILITY** OPERATION CONDITIONS

...

E.~~1~~**2**.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

...

E.~~1~~**2**.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) For Gasoline Dispensing Facilities [40 CFR Part 63 Subpart CCCCCC]

The Permittee, which owns and operates an existing gasoline dispensing facility at an area source of HAPs, shall comply with the following provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment ~~B~~ **C** of this permit).

...

Comment 4:

The entry for "three (3) metal storage tanks (S10, S11, and S12)" in the process weight rate spreadsheet on page 4 of 6 in the Technical Support Document Appendix A should be "three (3) concrete silos (S10, S11 and S12)." The maximum fill rate for these silos should be listed as 30,000 bushels per hour and the allowable and actual emissions calculated accordingly.

Response to Comment 4:

IDEM, OAQ does not make any changes to the original TSD. The requested changes have been incorporated into Appendix A to the ATSD. No changes to the permit were made as a result of this comment.

Comment 5:

Respectfully, Gavilon does not agree with the methodology used by IDEM to estimate potential haul road emissions and is concerned about how and/or whether the representation of maximum trips per day will impact demonstration of compliance (e.g., how does the facility demonstrate compliance if more than 40 semi trucks are unloaded per day?). The IDEM methodology relies on daily truck receipts to estimate the annual vehicle miles traveled. Due to the seasonal aspects of grain harvesting, the number of trucks received on a daily basis at the grain elevator varies greatly depending upon the time of year. During the "off season," there may be days when no trucks are loaded or unloaded, while during harvest, upwards of 200 trucks per day may be unloaded.

Potential emissions from the grain elevator are based on an annual throughput amount calculating using EPA guidance, which takes into consideration inherent physical limitations (market area) to determine realistic upper bound on the amount of grain an elevator could receive (EPA memorandums dated November 14, 1995 and January 25, 1995). The EPA methodology multiplies the highest amount of grain received during the previous 5 years by an adjustment factor of 1.2 instead of an hourly maximum rate multiplied by 8760 or a daily maximum multiplied by 365 days per year to determine the potential throughput.

The annual maximum amount of grain hauled at the elevator is therefore limited to the maximum amounts of grain received and shipped by truck (e.g. 579,847 tons/year + 579,847 tons/year = 1,159,694 tons/year). Gavilon believes that annual maximum haul road emissions are more accurately estimated using the number of trucks necessary to haul the annual maximum amount of grain received and shipped.

Gavilon also prefers to use more conservative emission factors for haul road emissions, based on the weight of semi trucks instead of smaller trucks. Using a full vehicle weight of 40 tons and an empty weight of 15 tons results in higher (i.e. more conservative) haul road emission factors.

Using Gavilon's proposed methodology to estimate haul road emissions, fugitive particulate matter emissions exceed 25 tons per year, which will require Gavilon to have a fugitive dust control plan. Gavilon prepared and submitted a fugitive dust control plan to IDEM via electronic mail on May 2, 2013. A spreadsheet containing haul road emissions calculations is included as an enclosure with this letter.

If IDEM accepts Gavilon's haul road emissions calculation methodology, the emissions summary table on page 1 of 6 of TSD Appendix A will need updated, as will the discussion regarding the applicability of 326 IAC 6-5 on page 8 of 11 of the Technical Support Document.

Response to Comment 5:

IDEM, OAQ does not make any changes to the original TSD. The requested changes have been incorporated into Appendix A to the ATSD.

Based on the ATSD Appendix A emission calculations, the source-wide potential to emit fugitive matter exceeds twenty-five (25) tons per year. Therefore, the source is subject to the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations). A fugitive dust control plan has been included in the permit as Attachment A and Condition C.7 - Fugitive Particulate Matter Emission Limitations has been added to the permit.

The permit has been revised as follows:
...

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on May 2, 2013. The plan is included as Attachment A.

...

The subsequent Section C - Conditions have been renumbered accordingly.

The May 2, 2013 submitted Fugitive Dust Control Plan has been included in the permit as Attachment A.

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

(1) IDEM, OAQ has revised the emission unit description for the gasoline fuel transfer and dispensing operation, contained in Sections A.2 and E.2 of the permit, to clarify the throughput capacities for rule applicability purposes.

(2) IDEM, OAQ has revised Condition D.1.2 - Preventative Maintenance Plan, to clarify the Permittee's obligation with regard to the preventive maintenance plan required by the condition.

...

A.2 Emission Units and Pollution Control Equipment Summary

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

...

(h) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day **and less than or equal to 10,000 gallons per month**, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. Such storage tanks may be in a fixed location or on mobile equipment. [This operation is considered an affected facility under 40 CFR 63, Subpart CCCCCC]

...

D.1.1 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each process shall be limited by the following:
...

(b) Pursuant to 326 IAC 6-3-2(e)(3), when the process weight exceeds 200 tons per hour, the maximum allowable emission may exceed the emission limits shown in the table above, provided the concentration of particulate matter in the gas discharged to the atmosphere is less than 0.10 pounds per 1,000 pounds of gases.

~~In order to comply with these limits, Pit #1 and Pit #2 are equipped with baffles for particulate control for all grain as it is received.~~

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for ~~any unit (storage bin vents and dryer) that requires maintenance to prevent malfunctions or result in violations of applicable air pollution control regulations or applicable emission limitations and any associated control devices~~ **the emission units identified in the table contained in Condition D.1.1(a) above**. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

...

SECTION E.2 FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

(h) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day **and less than or equal to 10,000 gallons per month**, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. Such storage tanks may be in a fixed location or on mobile equipment. [This operation is considered an affected facility under 40 CFR 63, Subpart CCCCCC]

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

...

IDEM Contact

(a) Questions regarding this proposed MSOP Renewal can be directed to Charles Sullivan 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) 232-8422 or toll free at 1-800-451-6027 extension 2-8422.

(b) A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

ATSD Appendix A: Emissions Calculations Summary

Company Name: Gavilon Grain, LLC
Address City IN Zip: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-32926-00038
Reviewer: C. Sullivan
Application Date: July 29, 2013

Summary of Uncontrolled Potential to Emit (PTE)

Pollutant	Non-Fugitive Emissions (Tons/yr)	Fugitive Emissions (Tons/yr)	Total PTE (Tons/Yr)*
PM	208.53	40.19	**248.72**
PM_{10}	73.41	9.55	**82.96**
$PM_{2.5}$	13.12	1.23	**14.34**
SO2	0.11	-	**0.11**
NOx	18.02	-	**18.02**
VOC	0.99	-	**0.99**
CO	15.14	-	**15.14**
CO2e	21,753	-	**21,753**
Lead	0.0001	-	**0.00**
Hexane	0.32	-	**0.32**
Combined HAPs	0.34	-	**0.34**

*Since there is an applicable New Source Performance Standard (NSPS DD) that was in effect on August 7, 1980, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Summary of Controlled Potential to Emit (PTE)

Pollutant	Non-Fugitive Emissions (Tons/yr)	Fugitive Emissions (Tons/yr)	Total PTE (Tons/Yr)*
PM	182.44	27.04	**209.48**
PM_{10}	64.86	6.59	**71.45**
$PM_{2.5}$	11.67	0.93	**12.60**
SO2	0.11	-	**0.11**
NOx	18.02	-	**18.02**
VOC	0.99	-	**0.99**
CO	15.14	-	**15.14**
CO2e	21,753	-	**21,753**
Lead	0.0001	-	**0.00**
Hexane	0.32	-	**0.32**
Combined HAPs	0.34	-	**0.34**

*Since there is an applicable New Source Performance Standard (NSPS DD) that was in effect on August 7, 1980, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

ATSD Appendix A: Emissions Calculations
Natural Gas Combustion - Dryer 1

Company Name: Gavilon Grain, LLC
Address City IN Zip: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-32926-00038
Reviewer: C. Sullivan
Date: July 29, 2013

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
41.95	1.020	360.4

	Pollutant						
	PM*	PM10*	direct 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	0.34	1.37	1.37	0.11	18.02	0.99	15.14

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

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

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.784E-04	2.162E-04	1.351E-02	3.243E-01	6.126E-04	3.390E-01

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	9.009E-05	1.982E-04	2.523E-04	6.847E-05	3.784E-04	9.874E-04
					Total HAPs	0.34
					Worst HAP	0.32

Methodology is the same as above.

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	21,622	0.4	0.4
Summed Potential Emissions in tons/yr	21,623		
CO2e Total in tons/yr	21,753		

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

ATSD Appendix A: Emissions Calculations
Grain Elevator

Company Name: Gavilon Grain, LLC
Address City IN Zip: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-32926-00038
Reviewer: C. Sullivan
Application Date: July 29, 2013

Maximum Grain Received from Farm (bushels of grain handled per year)* =	16,661,244	* Gavilon Grain proposed to use a 2008 max grain throughput although the PTE max for 2013 was lower
Capacity of East Temporary Storage Pile (bushels/year) =	1,666,000	Grain received at elevator, conveyed to the pile and then trucked back to elevator prior to shipment.
Capacity of West Temporary Storage Pile (bushels/year) =	1,001,000	Grain received at elevator, conveyed to the pile and then trucked back to elevator prior to shipment.
Weight of grain (lbs/bushel) =	60	
Maximum Grain Received from Farm (tons of grain handled per year) =	499,837	
Capacity of East Temporary Storage Pile (tons/year) =	49,980	
Capacity of West Temporary Storage Pile (tons/year) =	30,030	
* Gavilon Grain proposed to use a 2008 max grain throughput although the PTE max for 2013 was lower		
Grain Received (tons/year) =	579,847	Grain received from farm plus grain received at elevator (internal transfer) from temporary storage piles

Conveying or Headhouse/Internal Handling

Number of Steps =	3	Conservative estimate of the number of times grain is elevated (placed into storage after receipt,
Throughput for Conveying or Headhouse/Internal Handling (tons/year) =	1,499,512	after drying or repositioning and prior to loadout).
Number of Steps =	2	
Amount grain placed into storage bins (tons/year)=	999,675	Conservative estimate of the number of times grain is placed into storage (after receipt and after drying or repositioning).
Grain Shipped (tons/year) =	579,847	Grain shipped from elevator plus grain shipped (internal transfer) from temporary storage piles

Assumptions to Determine Worst-Case Potential Emissions

Straight Truck Receipts	100%	(highest emission factor)
Hopper Bottom Truck Receipts	100%	
Grain Dried	100%	
Truck Shipments	100%	(highest emission factor)
Rail Shipments	100%	

CONTROL EFFICIENCY

Pit Baffles	50%	Most conservative control efficiency used at IDEM OAQ

	Unloading / Receiving						Drying			Headhouse and Internal Handling			Storage Bin Vent			Shipping					
	Straight Truck			Hopper Bottom Truck			Column Dryer			Legs, Conveyors, etc.						Railcar			Truck		
	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$
Emission Factor in lbs/ton	0.18	0.059	0.010	0.035	0.0078	0.0013	0.22	0.055	0.0094	0.061	0.034	0.0058	0.05	0.0125	0.0011	0.027	0.0022	0.00037	0.086	0.029	0.0049
Uncontrolled PTE (tons/yr)	52.19	17.11	2.90	10.15	2.26	0.38	63.78	15.95	2.73	45.74	25.49	4.35	24.99	6.25	0.55	6.75	0.55	0.09	21.49	7.25	1.22
Controls (overall % efficiency)	50%	50%	50%	50%	50%	50%															
Controlled PTE (tons/yr)	26.09	8.55	1.45	5.07	1.13	0.19	63.78	15.95	2.73	45.74	25.49	4.35	24.99	6.25	0.55	6.75	0.55	0.09	21.49	7.25	1.22

Percentages for receiving, drying and shipping and the number of headhouse steps are based on facility information for the previous 5 years.
Emission factors from AP-42 Table 9.9.1 Particulate Emission Factors for Grain Elevators

	PM	PM_{10}	$PM_{2.5}$
Worst-Case Total Uncontrolled Emissions (tons/year)	208.19	72.04	11.75
Worst-Case Total Controlled Emissions (tons/year)	182.10	63.49	10.30

Note:
Calculations conservatively assume all grain is received through straight truck, dried in the column dryer, and shipped by truck.
Worst-Case PTE = Straigh Truck Unloading/Receiving + Drying + Headhouse and Internal Handling + Storage Bin Vent + Truck Shipping

ATSD Appendix A: Emission Calculations
PM Emissions From the Grain Handling, Storage and Drying Processes
Demonstration of Compliance with 326 IAC 6-3-2

Company Name: Gavilon Grain, LLC
Address City IN Zip: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-32926-00038
Reviewer: C. Sullivan
Application Date: July 29, 2013

Allowable Emissions Under 326 IAC 6-3-2

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (tons/hr)	PM Emission Factor (lbs/ton)	Collection and Control Efficiency (%)	PM Emissions Before Control (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)	PM Emissions After Control (lbs/hr)
Truck Loadout Spouts (11)	10,000	300	0.086		25.8	63.0	25.8
40,000 Belt Conveyor (B1)	40,000	1,200	0.061		73.2	80.0	73.2
B Bin South Bottom Drag Conveyor (D7)	20,000	600	0.061		36.6	71.2	36.6
B Bin North Bottom Drag Conveyor (D6)	20,000	600	0.061		36.6	71.2	36.6
East Pad Belt Conveyor (B2)	20,000	600	0.061		36.6	71.2	36.6
Pit #1 (P1)*	20,000	600	0.18	50%	108.0	71.2	54.0
Leg 1 (L1)	20,000	600	0.061		36.6	71.2	36.6
Pit Drag Coveyor 1 (D1)	20,000	600	0.061		36.6	71.2	36.6
Pit Drag Conveyor 3 (D3)	10,000	300	0.061		18.3	63.0	18.3
Brock Drag Conveyor (D9)	10,000	300	0.061		18.3	63.0	18.3
Brock Reclaim Conveyor (D16)	10,000	300	0.061		18.3	63.0	18.3
Pit #2 (P2)*	20,000	600	0.18	50%	108.0	71.2	54.0
Leg 2 (L2)	20,000	600	0.061		36.6	71.2	36.6
Pit Drag Conveyor 2 (D2)	20,000	600	0.061		36.6	71.2	36.6
Dry Leg (L7)	8,000	240	0.061		14.6	60.5	14.6
Big Tank Belt Conveyor (B3)	8,000	240	0.061		14.6	60.5	14.6
Big Tank Conveyor 1 (D15)	8,000	240	0.061		14.6	60.5	14.6
Pit #3 (P3)	10,000	300	0.18		54.0	63.0	54.0
Leg 3 (L3)	10,000	300	0.061		18.3	63.0	18.3
Wet Leg (L6)	6,000	180	0.061		11.0	57.4	11.0
NE Drag Conveyor (D13)	6,000	180	0.061		11.0	57.4	11.0
SE Drag Conveyor (D12)	6,000	180	0.061		11.0	57.4	11.0
NW Drag Conveyor (D11)	6,000	180	0.061		11.0	57.4	11.0
SW Drag Conveyor (D10)	6,000	180	0.061		11.0	57.4	11.0
B Bin Auger (A1)	4,000	120	0.061		7.3	53.1	7.3
SW Pad Auger (A3)	3,500	105	0.061		6.4	51.8	6.4
NW Pad Auger (A2)	3,500	105	0.061		6.4	51.8	6.4
Bin 1 Reclaim Conveyor (D17)	7,500	225	0.061		13.7	59.8	13.7
Bin 2 Reclaim Conveyor (D18)	7,500	225	0.061		13.7	59.8	13.7
B-Bin Top Fill Drag Conveyor (D19)	30,000	900	0.061		54.9	76.2	54.9
Big Tank Conveyor 2 (D20)	10,000	300	0.061		18.3	63.0	18.3
Loadout Conveyor (D21)	10,000	300	0.061		18.3	63.0	18.3
Dryer Reclaim Drag Conveyor (D22)	6,000	180	0.061		11.0	57.4	11.0
Jump Drag Conveyor (D23)	10,000	300	0.061		18.3	63.0	18.3
Long Belt Conveyor (B4)	10,000	300	0.061		18.3	63.0	18.3
Short Belt Conveyor (B5)	10,000	300	0.061		18.3	63.0	18.3
Truck Loadout Bin (1L)	10,000	300	0.086		25.8	63.0	25.8
Overhead Tank (T17)	10,000	300	0.086		25.8	63.0	25.8
Bulk Weigh Rail Loadout System **	40,000	1,200	0.027		32.4	80.0	32.4
Four (4) metal storage tanks (T3, T4, T13, T14)	10,000	300	0.025		7.5	63.0	7.5
One (1) metal storage tank (T5)	40,000	1,200	0.025		30.0	80.0	30.0
One (1) metal storage tank (T18)	10,000	300	0.025		7.5	63.0	7.5
Three (3) concrete storage tanks (S10, S11 and S12)	30,000	900	0.025		22.5	76.2	22.5
One (1) Overhead Storage Tank (T8)	20,000	600	0.025		15.0	71.2	15.0
One (1) Steel Storage Tank (Bin 1)	20,000	600	0.025		15.0	71.2	15.0
One (1) Steel Storage Tank (Bin 2)	20,000	600	0.025		15.0	71.2	15.0
Portable Belt Conveyor	7,000	210	0.061		12.8	59.0	12.8
Portable Belt Loader	5,000	150	0.061		9.2	55.4	9.2
Dryer 1	4,700	141	0.22		31.0	54.8	31.0

* Pit baffles were added as the control for grain receiving emissions.
** Rail Shipments only.

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate up to sixty thousand (60,000) pounds per hour (30 tons/hr):

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

Where the process weight rate is in excess of sixty thousand pounds per hour (30 tons/hr) calculate the allowable emissions using of the equation:

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

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (4/03)

Methodology
Maximum Grain Throughput (tons/hr) = Maximum Grain Throughput (bushels/hr) x 60 (lbs/bushel) x 1 ton/2000 lbs
PTE of PM/PM_{10} Before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton)
PTE of PM/PM_{10} After Control (tons/yr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton) x (1- Control Efficiency (%))

ATSD Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Gavilon Grain, LLC
Source Address: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-32926-00038
Reviewer: C. Sullivan
Date: July 29, 2013

Maximum Potential to Emit

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on maximum annual throughput and AP-42, Ch 13.2.2 (12/2003).
The number of trucks unloaded and loaded each day varies widely depending upon the season (harvest versus non-harvest).
Annual haul road emissions are based on the maximum annual throughput amount of grain (grain received and grain shipped).

Vehicle Information	Used 18-wheel vehicle (i.e. semi), since this type of vehicle results in the most conservative emissions estimate.	
Empty Vehicle Weight =	15	tons
Full Vehicle Weight =	40	tons
Average Vehicle Weight =	27.5	tons
Material Hauled		
Maximum Grain Receipts =	579,847	tons/year
Maximum Grain Shipments =	579,847	tons/year
Maximum Grain Hauled =	1,159,694	tons/year
Number of Round Trips =	42,171	Material Hauled (tons/year) / Average Vehicle Weight (tons/trip)
Haul Road Length (Round Trip) =	0.4	miles
Vehicle Miles Traveled =	16,868	Number of round trips * miles per round trip = miles/year

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

	PM	PM_{10}	$PM_{2.5}$	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	2.6	2.6	2.6	% = mean % silt content of unpaved roads
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2)
W =	27.5	27.5	27.5	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365]
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM_{10}	$PM_{2.5}$	
Unmitigated Emission Factor, Ef =	4.55	1.03	0.10	lb/mile
Mitigated Emission Factor, Eext =	2.99	0.67	0.07	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM_{10} (tons/yr)	Unmitigated PTE of $PM_{2.5}$ (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM_{10} (tons/yr)	Mitigated PTE of $PM_{2.5}$ (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM_{10} (tons/yr)	Controlled PTE of $PM_{2.5}$ (tons/yr)
38.40	8.66	0.87	25.25	5.69	0.57	12.62	2.85	0.28

Methodology
Unmitigated PTE (tons/yr) = (Maximum miles/year) * (Unmitigated Emission Factor (lb/mile) * (ton/2000 lbs)
Mitigated PTE (tons/yr) = (Maximum miles/year) * (Mitigated Emission Factor (lb/mile) * (ton/2000 lbs)
Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)
The mean % silt content of unpaved roads is from the EPA website http://www.epa.gov/ttn/chief/ap42/ch13/related/c13s02-2.html

Abbreviations
PM = Particulate Matter
PM_{10} = Particulate Matter (≤10 µm)
$PM_{2.5}$ = Particulate Matter (≤2.5 µm)
PTE = Potential to Emit

ATSD Appendix A: Emission Calculations
Storage Pile Wind Erosion

Company Name: Gavilon Grain, LLC
Source Address: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-32926-00038
Reviewer: C. Sullivan
Date: July 29, 2013

STORAGE PILE AREA	East Pile	West Pile	Total
Length (feet) =	500	500	
Width (feet) =	185	145	
Area (feet^2) =	92,500	72,500	
Conversion Factor (feet^2/acre) =	43,560		
Storage Pile Area (acres) =	2.12	1.66	3.79

STORAGE PILE WIND EROSION EMISSION FACTOR

Storage Pile Wind Erosion Emission Factor = $E = 1.7*(s/1.5)*[(365 - p)/(235)]*(f/15)$

From "Air Pollution Engineering Manual" by the Air and Waste Management Association, Edited by Anthony J. Buonicore and Wayne T. Davis, Van Nostrand Reinhold, New York,1992, Section 4 page 136. Fugitive Emissions, Storage-Pile Wind Erosion Equation 4.

Particle Size Multiplier PM =	1	
Particle Size Multiplier PM_{10} =	0.5	From "Air Pollution Engineering Manual" by the Air and Waste Management Association, Edited by Anthony J. Buonicore and Wayne T. Davis, Van Nostrand Reinhold, New York, 1992, Section 4, page 136.
Particle Size Multiplier $PM_{2.5}$ =	0.2	
Silt Content (s) =	2	Based on United States Department of Agriculture Foreign Matter limit for U.S. Number 1 grade grain for corn (7 CFR 810.404).
Number of Wet Days (p) =	120	From AP-42, Chapter 13, Section 13.2.1 Paved Roads, Figure 13.2.1-2. Mean number of days with 0.01 inch or more of precipitation in the United States (January 2011).
Unobstructed Wind Speed (%) (f) =	16.5	Percent of the time the unobstructed wind speed exceeds 12 miles per hour based on the Evansville/Dress Regional Airport (i.e. the closest meteorological station) data obtained from the SCRAM Surface Meteorological Archived Data 1984 to 1992 (http://www.epa.gov/scram001/surfacemetdata.htm).
Number of Days Pile is Uncovered =	365	Worst case estimate

	PM	PM_{10}	$PM_{2.5}$	
Storage Pile Wind Erosion Emission Factor =	2.60	1.30	0.52	lb/acre/day

WIND EROSION EMISSIONS FROM STORAGE PILES

PTE (tons/yr) = (Emission Factor (lb/acre/day)) * (Maximum Pile Size (acres)) * (Number of Days Pile is Uncovered) * (ton/2000 lbs)

	PTE PM (tons/year)	PTE PM_{10} (tons/year)	PTE $PM_{2.5}$ (tons/year)
Maximum Annual Wind Erosion Emissions	**1.80**	**0.90**	**0.36**

Abbreviations
lb = pound
PM = particulate matter
PM10 = particulate matter with a nominal aerodynamic diameter of 10 microns or less
PM2.5 = particulate matter with a nominal aerodynamic diameter of 2.5 microns or less
PTE = Potential to Emit

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**Gavilon Grain, LLC**
Source Location:	**7646 North County Road 125 East, Shelburn, Indiana 47879**
County:	**Sullivan**
SIC Code:	**5153 (Grain and Field Beans)**
Permit Renewal No.:	**M153-32926-00038**
Permit Reviewer:	**Charles Sullivan**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Gavilon Grain, LLC relating to the operation of a grain receiving, handling, drying, storage, and shipping facility. On March 8, 2013, Gavilon Grain, LLC submitted an application to the OAQ requesting to renew its Minor Source Operating Permit No.: M153-25653-00038, issued on July 7, 2008.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) enclosed grain receiving operation, identified as RECEIVING, constructed in 1972 and approved for modification in 2009, and consisting of the following:

(1) One (1) truck dump pit, identified as Pit #1 (P1), with a maximum capacity of 20,000 bushels per hour (600 tons/hr), equipped with a baffle for particulate control.

(2) One (1) truck dump pit, identified as Pit #2 (P2), with a maximum capacity of 20,000 bushels per hour (600 tons/hr), equipped with a baffle for particulate control.

(3) One (1) truck dump pit, identified as Pit #3 (P3), with a maximum capacity of 10,000 bushels per hour (300 tons/hr), with emissions exhausted to the atmosphere.

(b) One (1) column grain dryer, with a natural gas-fired, low emission cyclone burner, identified as DRYER1, constructed in 1998, with a plate perforation diameter of 0.07 inches, with a maximum heat input capacity of 41.96 MMBtu/hr and a maximum throughput rate of 4,700 bushels of grain per hour (140 tons/hr). The dryer is loaded by the Wet Leg (L6) & emptied by the Dry Leg (L7).

(c) One (1) internal handling operation, identified as Grain Conveying, with a maximum capacity of 54,700 bushels per hour (1,641 tons per hour), constructed between 1962 and 2010, consisting of bucket elevators (legs), drag conveyors, belt conveyors, distributors and augers, consisting of the following:

Emissions Unit Description	Year Constructed	Maximum (bushels/hr)
40,000 Belt Conveyor (B1)	2006	40,000
B Bin South Bottom Drag Conveyor (D7)	2003	20,000
B Bin North Bottom Drag Conveyor (D6)	2003	20,000
East Pad Belt Conveyor (B2)	2006	20,000
Leg 1 (L1)	2001	20,000
Pit Drag Conveyor 1 (D1)	2001	20,000

Emissions Unit Description	Year Constructed	Maximum (bushels/hr)
Pit Drag Conveyor 3 (D3)	2007	10,000
Brock Drag Conveyor (D9)	1972	10,000
Brock Reclaim Conveyor (D16)	1987	10,000
Leg 2 (L2)	1972	20,000
Pit Drag Conveyor 2 (D2)	1972	20,000
Dry Leg (L7)	1998	8,000
Big Tank Belt Conveyor (B3)	1972	8,000
Big Tank Conveyor 1 (D15)	1990	8,000
Leg 3 (L3)	1972	10,000
Wet Leg (L6)	1998	6,000
NE Drag Conveyor (D13)	1972	6,000
SE Drag Conveyor (D12)	1972	6,000
NW Drag Conveyor (D11)	1972	6,000
SW Drag Conveyor (D10)	1972	6,000
B Bin Auger (A1)	1972	4,000
SW Pad Auger (A3)	1972	3,500
NW Pad Auger (A2)	1972	3,500
Bin 1 Reclaim Conveyor (D17)	2009	7,500
Bin 2 Reclaim Conveyor (D18)	2009	7,500
B-Bin Top Fill Drag Conveyor (D19)	2008	30,000
Big Tank Conveyor 2 (D20)	2010	10,000
Loadout Conveyor (D21)	2008	10,000
Dryer Reclaim Drag Conveyor (D22)	1998	6,000
Jump Drag Conveyor (D23)	1998	10,000
Long Belt Conveyor (B4)	1990	10,000
Short Belt Conveyor (B5)	1990	10,000
Portable Belt Conveyor	2005	7,000
Portable Belt Loader	2002	5,000

(d) One (1) Storage system, identified as STORAGE, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, and consisting of the following:

(1) Four (4) metal storage tanks, identified as SE (T3), NE (T4), SW (T13), and NW (T14), constructed in 1987, with a combined storage capacity of 126,740 bushels (3802 tons) and a maximum unload capacity of 10,000 bushels per hour (300 tons/hr). Each of these four tanks are vented to the atmosphere, with each tank having four vents labeled a, b, c, and d, respectively. SE (T3) & NE (T4) have truck loadout spouts.

(2) One (1) metal storage tank, identified as the BIG TANK (T5), constructed in 1972, with storage capacity of 353,489 bushels (10,605 tons), a maximum fill capacity of 40,000 bushels per hour (1200 tons/hr) and a maximum unload capacity of 8,000 bushels per hour (240 tons/hr), vented to the atmosphere through vent 5a & 5b. The BIG TANK (T5) has a truck loadout spout.

(3) One (1) metal storage tank, identified as BROCK (T18), constructed in 1987, with storage capacity of 273,198 bushels (8196 tons) and a maximum unload capacity of 10,000 bushels per hour (300 tons/hr), vented to the atmosphere through ten vents, identified as vents 18 a-j.

(4) Three (3) concrete silos, identified as B1 (S10), B2 (S11), B3 (S12) constructed in 1977, with a combined storage capacity of 303,464 bushels (9104 tons) and a maximum unload capacity of 30,000 bushels per hour (900 tons/hr), vented to the atmosphere through vents 10a & b, 11a & b, and 12a &b, respectively. Silos B1, B2, and B3 have truck loadout spouts.

(5) One (1) temporary outdoor storage pile, on a concrete surface, covered by tarpaulin, identified as WEST PAD (XT2), with a capacity of 1,001,000 bushels of grain (30,030 tons), constructed in 1972, with dimensions of 145 feet x 500 feet.

(6) One (1) temporary outdoor storage pile, on a gravel surface, covered by tarpaulin, identified as EAST PAD (XT4), with a capacity of 1,666,000 bushels of grain (49,980 tons), constructed in 2006, with dimensions of 185 feet x 500 feet.

(7) One (1) over head storage tank, identified as West (T8), constructed in 1972, with total storage capacity of 21,381 bushels, with a maximum through put of 20,000 bushels per hour (600 tons/hr), and exhausting through vent (8a) to the atmosphere.

(8) One (1) steel storage tank, constructed in 2009, identified as Bin 2, with total storage capacity of 27,286 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

(9) One (1) steel storage tank, constructed in 2009, identified as Bin 1, with total storage capacity of 21,631 bushels, with a maximum fill capacity of 20,000 bushels per hour (600tons/hr) and with a maximum unload capacity of 7,500 bushels per hour (225 tons/hr), and exhausting to the atmosphere.

(e) One (1) grain loadout operation, identified as SHIPPING, constructed in 1972 and approved for modification in 2009, with emissions exhausted to the atmosphere, consisting of the following:

(1) One (1) truck loadout bin, identified as 1L, with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(2) Eleven (11) side draw truck loadout spouts, each with a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr).

(3) One (1) steel overhead loadout bin, identified as #3 OVERHEAD Tank (T17), constructed in 1972, and a maximum loadout capacity of 10,000 bushels per hour (300 tons/hr), equipped with a loadout spout, with a storage capacity of 1,989 bushels (60 tons).

(4) One (1) Bulk Weigh Rail loadout system rated at 40,000 bushels per hour (1,200 tons/hr) with telescoping spouts, constructed in 2009.

(f) Underground conveyors.

(g) Paved roads and parking lots with public access. [326 IAC 6-4]

(h) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. Such storage tanks may be in a fixed location or on mobile equipment. [This operation is considered an affected facility under 40 CFR 63, Subpart CCCCCC]

(i) Pressurized storage tanks and associated piping for Acetylene.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

(a) Three (3) metal storage tanks, identified as DIRTY (T19), CLEAN YELLOW (20), and CLEAN WHITE (21), constructed in 1972, with a combined storage capacity of 6,193 bushels (186 tons) and a maximum upload capacity of 6,000 bushels per hour (180 tons/hr).

Existing Approvals

Since the issuance of the New Source Construction MSOP No. M153-25653-00038 on July 7, 2008 the source has constructed or has been operating under the following additional approvals:

(a) Notice-Only Change No. 153-28334-00038 issued on September 11, 2009; and

(b) Minor Permit Revision No. 153-28514-00038 issued on November 10, 2009.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Sullivan County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Sullivan 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) $PM_{2.5}$
Sullivan 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 $PM_{2.5,}$ $SO_{2,}$ and NOx 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
Sullivan County has been classified as attainment or unclassifiable in Indiana for all pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Note: Although the New Source Performance Standard (NSPS) for Grain Elevators (40 CFR 60, Subpart DD) was promulgated on or before August 7, 1980, this facility does not fall within the "listed source category" for Subpart DD, since this grain elevator does not have a permanent storage capacity of more than 2.5 million bushels. The permanent storage capacity of the source is 0.49 million U.S. bushels.

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

Unrestricted Potential Emissions

This table reflects the unrestricted non-fugitive potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year*
PM	208.53
PM_{10}**	73.41
$PM_{2.5}$	13.12
SO_2	0.11
VOC	0.99
CO	15.14
NO_x	18.02
GHGs as CO_2e	21,753
Single HAP	0.32 (hexane)
Total HAP	0.34

* Fugitive PM, PM10, and PM2.5 emissions are not counted toward the determination of PSD applicability.

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

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM10 and PM2.5 are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) Renewal will be issued.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

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, although the combined storage capacity of the outdoor storage piles, identified as XT2 and XT9, are greater than 2.5 million bushels, because these storage piles, with a maximum storage capacity of 1.0 and 1.7 million bushels of grain, respectively, are classified as "non-permanent" based on the definition in 40 CFR 60.301(d). Therefore, this source is also not considered as a grain terminal elevator as defined in 40 CFR 60.301(c) because the permanent storage capacity is less than 2.5 million bushels. This source is also not considered as a grain storage elevator as defined in 40 CFR 60.301(f) because it is not associated with any mill or oil extraction plant.

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.

For the reasons cited above, all other emission units at the facility including truck unloading and loading stations, internal grain handling, grain receiving, shipping and dryers are not subject to the requirements of 40 CFR Part 60.300, Subpart DD.

(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 source is subject to the National Emission Standards for Hazardous Air Pollutants for: Gasoline Dispensing Facilities 40 CFR 63, Subpart CCCCCC, because it operates a gasoline dispensing facility (GDF), as defined in 40 CFR 63.11132, that is located at an area source.

The facilities subject to this rule include the following:

Gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. Such storage tanks may be in a fixed location or on mobile equipment.

Applicable portions of the NESHAP are the following:

(1) 40 CFR 63.11110
(2) 40 CFR 63.11111(a), (b), (e), (f), (h), (i), (j), and (k)
(3) 40 CFR 63.11112(a) and (d)
(4) 40 CFR 63.11113(b) and (c)
(5) 40 CFR 63.11115
(6) 40 CFR 63.11116
(7) 40 CFR 63.11130
(8) 40 CFR 63.11131
(9) 40 CFR 63.11132
(10) Table 3

(e) 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 operate any boilers. This source only contains a natural gas fired grain dryer.

(f) 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 this permit renewal, 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 only consists of a grain elevator.

(g) 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.

Compliance Assurance Monitoring (CAM)

(h) 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)

This source is not one of the twenty-eight (28) listed source categories, and the potential to emit (PTE) of all criteria pollutants is less than two hundred fifty (250) tons per year and the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO_2e per year. Therefore, this source is a minor source and 326 IAC 2-2 (PSD) does not apply.

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 applicability.

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 Sullivan 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

This source is not subject to the requirements of 326 IAC 6-5, because it has potential fugitive particulate emissions less than twenty-five (25) tons per year.

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

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.

State Rule Applicability – Individual Facilities

Grain Elevator

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each process shall be limited by the following:

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

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

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The following table shows the maximum process weight rate and allowable particulate emission rate for each emission unit:

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (tons/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)
Truck Loadout Spouts (11)	10,000	300	63.0
40,000 Belt Conveyor (B1)	40,000	1,200	80.0
B Bin South Bottom Drag Conveyor (D7)	20,000	600	71.2
B Bin North Bottom Drag Conveyor (D6)	20,000	600	71.2
East Pad Belt Conveyor (B2)	20,000	600	71.2
Pit #1 (P1)*	20,000	600	71.2
Leg 1 (L1)	20,000	600	71.2
Pit Drag Conveyor 1 (D1)	20,000	600	71.2
Pit Drag Conveyor 3 (D3)	10,000	300	63.0
Brock Drag Conveyor (D9)	10,000	300	63.0
Brock Reclaim Conveyor (D16)	10,000	300	63.0
Pit #2 (P2)*	20,000	600	71.2
Leg 2 (L2)	20,000	600	71.2
Pit Drag Conveyor 2 (D2)	20,000	600	71.2
Dry Leg (L7)	8,000	240	60.5
Big Tank Belt Conveyor (B3)	8,000	240	60.5
Big Tank Conveyor 1 (D15)	8,000	240	60.5
Pit #3 (P3)	10,000	300	63.0
Leg 3 (L3)	10,000	300	63.0
Wet Leg (L6)	6,000	180	57.4
NE Drag Conveyor (D13)	6,000	180	57.4
SE Drag Conveyor (D12)	6,000	180	57.4
NW Drag Conveyor (D11)	6,000	180	57.4
SW Drag Conveyor (D10)	6,000	180	57.4
B Bin Auger (A1)	4,000	120	53.1
SW Pad Auger (A3)	3,500	105	51.8
NW Pad Auger (A2)	3,500	105	51.8
Bin 1 Reclaim Conveyor (D17)	7,500	225	59.8
Bin 2 Reclaim Conveyor (D18)	7,500	225	59.8
B-Bin Top Fill Drag Conveyor (D19)	30,000	900	76.2
Big Tank Conveyor 2 (D20)	10,000	300	63.0
Loadout Conveyor (D21)	10,000	300	63.0
Dryer Reclaim Drag Conveyor (D22)	6,000	180	57.4
Jump Drag Conveyor (D23)	10,000	300	63.0
Long Belt Conveyor (B4)	10,000	300	63.0
Short Belt Conveyor (B5)	10,000	300	63.0
Truck Loadout Bin (1L)	10,000	300	63.0
Overhead Tank (T17)	10,000	300	63.0
Bulk Weigh Rail Loadout System **	40,000	1,200	80.0

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (tons/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)
Four (4) metal storage tanks (T3, T4, T13 and T14)	10,000	300	63.0
One (1) metal storage tank (T5)	40,000	1,200	80.0
One (1) metal storage tank (T18)	10,000	300	63.0
Three (3) concrete silos (S10, S11 and S12)	30,000	900	76.2
One (1) Overhead Storage Tank (T8)	20,000	600	71.2
One (1) Steel Storage Tank (Bin 1)	20,000	600	71.2
One (1) Steel Storage Tank (Bin 2)	20,000	600	71.2
Portable Belt Conveyor	7,000	210	59.0
Portable Belt Loader	5,000	150	55.4
Dryer 1	4,700	141	54.8
* Pit baffles at Pit #1 and Pit #2 were added as the control for grain receiving emissions			
** Rail shipments only			

Calculations based on AP-42 emission factors indicate that the truck dump pit, identified as Pit #1 has uncontrolled potential PM emissions greater than the 326 IAC 6-3-2 allowable PM emission rate. Therefore, in order to comply with this limit, the baffles associated with Pit #1 shall be in operation at all times the grain receiving operation identified as RECEIVING is in operation.

Calculations based on AP-42 emission factors indicate that the truck dump pit, identified as Pit #2 has uncontrolled potential PM emissions greater than the 326 IAC 6-3-2 allowable PM emission rate. Therefore, in order to comply with this limit, the baffles associated with Pit #2 shall be in operation at all times the grain receiving operation identified as RECEIVING is in operation.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the grain elevator will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

Grain Dryer (Natural Gas Combustion)

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

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

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

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

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

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

Compliance Determination and Monitoring Requirements

The compliance monitoring requirements applicable to this source are as follows:

In order to comply with the Pit #1 and Pit #2 326 IAC 6-3-2 particulate emission limitations, the baffles associated with the two (2) truck receiving pits (Pit #1 and Pit #2) shall be in operation and control particulate emissions from the respective receiving pit at all times the receiving pits are in operation.

Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 8, 2013.

Conclusion

The operation of this grain receiving, handling, drying, storage, and shipping source shall be subject to the conditions of the attached MSOP Renewal No. M153-32926-00038.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Charles Sullivan 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) 232-8422 or toll free at 1-800-451-6027 extension 2-8422.

(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

Appendix A: Emissions Calculations
Summary

Company Name: Gavilon Grain, LLC
Address City IN Zip: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-32926-00038
Reviewer: C. Sullivan
Application Date: March 8, 2013

Summary of Uncontrolled Potential to Emit (PTE)

Pollutant	Non-Fugitive Emissions (Tons/yr)	Fugitive Emissions (Tons/yr)
PM	208.53	16.34
PM_{10}	73.41	4.18
$PM_{2.5}$	13.12	0.69
SO2	0.11	-
NOx	18.02	-
VOC	0.99	-
CO	15.14	-
CO2e	21,753	-
Lead	0.0001	-
Hexane	0.32	-
Combined HAPs	0.34	-

Summary of Controlled Potential to Emit (PTE)

Pollutant	Non-Fugitive Emissions (Tons/yr)	Fugitive Emissions (Tons/yr)
PM	182.44	16.34
PM_{10}	64.86	4.18
$PM_{2.5}$	11.67	0.69
SO2	0.11	-
NOx	18.02	-
VOC	0.99	-
CO	15.14	-
CO2e	21,753	-
Lead	0.0001	-
Hexane	0.32	-
Combined HAPs	0.34	-

Appendix A: Emissions Calculations
Natural Gas Combustion - Dryer 1

Company Name: Gavilon Grain, LLC
Address City IN Zip: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-32926-00038
Reviewer: C. Sullivan
Date: March 8, 2013

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
41.96	1020	360.4

	Pollutant						
	PM*	PM10*	direct 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	0.34	1.37	1.37	0.11	18.02	0.99	15.14

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

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

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.784E-04	2.162E-04	1.351E-02	3.243E-01	6.126E-04	**3.390E-01**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	9.009E-05	1.982E-04	2.523E-04	6.847E-05	3.784E-04	**9.874E-04**

Total HAPs	**0.34**
Worst HAP	**0.32**

Methodology is the same as above.

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	21,622	0.4	0.4
Summed Potential Emissions in tons/yr	21,623		
CO2e Total in tons/yr	21,753		

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

Appendix A: Emissions Calculations
Grain Elevator

Company Name: Gavilon Grain, LLC
Address City IN Zip: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-32926-00038
Reviewer: C. Sullivan
Application Date: March 8, 2013

Maximum Grain Received from Farm (bushels of grain handled per year)* =	16,661,244	* Gavilon Grain proposed to use a 2008 max grain throughput although the PTE max for 2013 was lower
Capacity of East Temporary Storage Pile (bushels/year) =	1,666,000	Grain received at elevator, conveyed to the pile and then trucked back to elevator prior to shipment.
Capacity of West Temporary Storage Pile (bushels/year) =	1,001,000	Grain received at elevator, conveyed to the pile and then trucked back to elevator prior to shipment.
Weight of grain (lbs/bushel) =	60	
Maximum Grain Received from Farm (tons of grain handled per year) =	499,837	
Capacity of East Temporary Storage Pile (tons/year) =	49,980	
Capacity of West Temporary Storage Pile (tons/year) =	30,030	
* Gavilon Grain proposed to use a 2008 max grain throughput although the PTE max for 2013 was lower		
Grain Received (tons/year) =	579,847	Grain received from farm plus grain received at elevator (internal transfer) from temporary storage piles
Conveying or Headhouse/Internal Handling		
Number of Steps =	3	Conservative estimate of the number of times grain is elevated (placed into storage after receipt,
Throughput for Conveying or Headhouse/Internal Handling (tons/year) =	1,499,512	after drying or repositioning and prior to loadout).
Number of Steps =	2	
Amount grain placed into storage bins (tons/year)=	999,675	Conservative estimate of the number of times grain is placed into storage (after receipt and after drying or repositioning).
Grain Shipped (tons/year) =	579,847	Grain shipped from elevator plus grain shipped (internal transfer) from temporary storage piles

Assumptions to Determine Worst-Case Potential Emissions

Straight Truck Receipts	100%	(highest emission factor)
Hopper Bottom Truck Receipts	100%	
Grain Dried	100%	
Truck Shipments	100%	(highest emission factor)
Rail Shipments	100%	

CONTROL EFFICIENCY

Pit Baffles	50%	Most conservative control efficiency used at IDEM OAQ

	Unloading / Receiving						Drying			Headhouse and Internal Handling			Storage Bin Vent			Shipping					
	Straight Truck			Hopper Bottom Truck			Column Dryer			Legs, Conveyors, etc.						Railcar			Truck		
	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$
Emission Factor in lbs/ton	0.18	0.059	0.010	0.035	0.0078	0.0013	0.22	0.055	0.0094	0.061	0.034	0.0058	0.05	0.0125	0.0011	0.027	0.0022	0.00037	0.086	0.029	0.0049
Uncontrolled PTE (tons/yr)	**52.19**	**17.11**	**2.90**	10.15	2.26	0.38	**63.78**	**15.95**	**2.73**	**45.74**	**25.49**	**4.35**	**24.99**	**6.25**	**0.55**	6.75	0.55	0.09	**21.49**	**7.25**	**1.22**
Controls (overall % efficiency)	50%	50%	50%	50%	50%	50%															
Controlled PTE (tons/yr)	**26.09**	**8.55**	**1.45**	5.07	1.13	0.19	**63.78**	**15.95**	**2.73**	**45.74**	**25.49**	**4.35**	**24.99**	**6.25**	**0.55**	6.75	0.55	0.09	**21.49**	**7.25**	**1.22**

Percentages for receiving, drying and shipping and the number of headhouse steps are based on facility information for the previous 5 years.
Emission factors from AP-42 Table 9.9.1 Particulate Emission Factors for Grain Elevators

	PM	PM_{10}	$PM_{2.5}$
Worst-Case Total Uncontrolled Emissions (tons/year)	208.19	72.04	11.75
Worst-Case Total Controlled Emissions (tons/year)	182.10	63.49	10.30

Note:
Calculations conservatively assume all grain is received through straight truck, dried in the column dryer, and shipped by truck.
Worst-Case PTE = Straigh Truck Unloading/Receiving + Drying + Headhouse and Internal Handling + Storage Bin Vent + Truck Shipping

Appendix A: Emission Calculations
PM Emissions From the Grain Handling, Storage and Drying Processes
Demonstration of Compliance with 326 IAC 6-3-2

Company Name: Gavilon Grain, LLC
Address City IN Zip: 7646 North 125 East She
Permit Number: M153-32926-00038
Reviewer: C. Sullivan
Application Date: March 8, 2013

Allowable Emissions Under 326 IAC 6-3-2

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (tons/hr)	PM Emission Factor (lbs/ton)	Collection and Control Efficiency (%)	PM Emissions Before Control (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)	PM Emissions After Control (lbs/hr)
Truck Loadout Spouts (11)	10,000	300	0.086		25.8	63.0	25.8
40,000 Belt Conveyor (B1)	40,000	1,200	0.061		73.2	80.0	73.2
B Bin South Bottom Drag Conveyor (D7)	20,000	600	0.061		36.6	71.2	36.6
B Bin North Bottom Drag Conveyor (D6)	20,000	600	0.061		36.6	71.2	36.6
East Pad Belt Conveyor (B2)	20,000	600	0.061		36.6	71.2	36.6
Pit #1 (P1)*	20,000	600	0.18	50%	108.0	71.2	54.0
Leg 1 (L1)	20,000	600	0.061		36.6	71.2	36.6
Pit Drag Coveyor 1 (D1)	20,000	600	0.061		36.6	71.2	36.6
Pit Drag Conveyor 3 (D3)	10,000	300	0.061		18.3	63.0	18.3
Brock Drag Conveyor (D9)	10,000	300	0.061		18.3	63.0	18.3
Brock Reclaim Conveyor (D16)	10,000	300	0.061		18.3	63.0	18.3
Pit #2 (P2)*	20,000	600	0.18	50%	108.0	71.2	54.0
Leg 2 (L2)	20,000	600	0.061		36.6	71.2	36.6
Pit Drag Conveyor 2 (D2)	20,000	600	0.061		36.6	71.2	36.6
Dry Leg (L7)	8,000	240	0.061		14.6	60.5	14.6
Big Tank Belt Conveyor (B3)	8,000	240	0.061		14.6	60.5	14.6
Big Tank Conveyor 1 (D15)	8,000	240	0.061		14.6	60.5	14.6
Pit #3 (P3)	10,000	300	0.18		54.0	63.0	54.0
Leg 3 (L3)	10,000	300	0.061		18.3	63.0	18.3
Wet Leg (L6)	6,000	180	0.061		11.0	57.4	11.0
NE Drag Conveyor (D13)	6,000	180	0.061		11.0	57.4	11.0
SE Drag Conveyor (D12)	6,000	180	0.061		11.0	57.4	11.0
NW Drag Conveyor (D11)	6,000	180	0.061		11.0	57.4	11.0
SW Drag Conveyor (D10)	6,000	180	0.061		11.0	57.4	11.0
B Bin Auger (A1)	4,000	120	0.061		7.3	53.1	7.3
SW Pad Auger (A3)	3,500	105	0.061		6.4	51.8	6.4
NW Pad Auger (A2)	3,500	105	0.061		6.4	51.8	6.4
Bin 1 Reclaim Conveyor (D17)	7,500	225	0.061		13.7	59.8	13.7
Bin 2 Reclaim Conveyor (D18)	7,500	225	0.061		13.7	59.8	13.7
B-Bin Top Fill Drag Conveyor (D19)	30,000	900	0.061		54.9	76.2	54.9
Big Tank Conveyor 2 (D20)	10,000	300	0.061		18.3	63.0	18.3
Loadout Conveyor (D21)	10,000	300	0.061		18.3	63.0	18.3
Dryer Reclaim Drag Conveyor (D22)	6,000	180	0.061		11.0	57.4	11.0
Jump Drag Conveyor (D23)	10,000	300	0.061		18.3	63.0	18.3
Long Belt Conveyor (B4)	10,000	300	0.061		18.3	63.0	18.3
Short Belt Conveyor (B5)	10,000	300	0.061		18.3	63.0	18.3
Truck Loadout Bin (1L)	10,000	300	0.086		25.8	63.0	25.8
Overhead Tank (T17)	10,000	300	0.086		25.8	63.0	25.8
Bulk Weigh Rail Loadout System **	40,000	1,200	0.027		32.4	80.0	32.4
Four (4) metal storage tanks (T3, T4, T13, T14)	10,000	300	0.025		7.5	63.0	7.5
One (1) metal storage tank (T5)	40,000	1,200	0.025		30.0	80.0	30.0
One (1) metal storage tank (T18)	10,000	300	0.025		7.5	63.0	7.5
Three (3) metal storage tanks (S10, S11 and S12)	6,000	180	0.025		4.5	57.4	4.5
One (1) Overhead Storage Tank (T8)	20,000	600	0.025		15.0	71.2	15.0
One (1) Steel Storage Tank (Bin 1)	20,000	600	0.025		15.0	71.2	15.0
One (1) Steel Storage Tank (Bin 2)	20,000	600	0.025		15.0	71.2	15.0
Portable Belt Conveyor	7,000	210	0.061		12.8	59.0	12.8
Portable Belt Loader	5,000	150	0.061		9.2	55.4	9.2
Dryer 1	4,700	141	0.22		31.0	54.8	31.0

* Pit baffles were added as the control for grain receiving emissions.
** Rail Shipments only.

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate up to sixty thousand (60,000) pounds per hour (30 tons/hr):

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

Where the process weight rate is in excess of sixty thousand pounds per hour (30 tons/hr) calculate the allowable emissions using of the equation:

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

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (4/03)

Methodology
Maximum Grain Throughput (tons/hr) = Maximum Grain Throughput (bushels/hr) x 60 (lbs/bushel) x 1 ton/2000 lbs
PTE of PM/PM_{10} Before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton)
PTE of PM/PM_{10} After Control (tons/yr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton) x (1- Control Efficiency (%))

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Gavilon Grain, LLC
Source Address: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-32926-00038
Reviewer: C. Sullivan
Date: March 8, 2013

Maximum Potential to Emit
Unpaved Roads at Industrial Site
The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Information

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (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)
6-Wheel Vehicle (entering plant) (one-way trip)	1	20	20	7.5	150	1056	0.200	4.00	1460
6-Wheel Vehicle (leaving plant) (one-way trip)	1	20	20	17.5	350	1056	0.200	4.00	1460
10-Wheel Vehicle (entering plant) (one-way trip)	1	15	15	10.0	150	1056	0.200	3.00	1095
10-Wheel Vehicle (leaving plant) (one-way trip)	1	15	15	27.5	413	1056	0.200	3.00	1095
18-Wheel Vehicle (entering plant) (one-way trip)	1	40	40	12.5	500	1056	0.200	8.00	2920
18-Wheel Vehicle (leaving plant) (one-way trip)	1	40	40	40.0	1600	1056	0.200	8.00	2920
		Total	**150**		**3163**			**30**	**10,950**

Average Vehicle Weight Per Trip = 21.1 tons/trip
Average Miles Per Trip = 0.20 miles/trip
* Maximum Grain received (tons/year) = 1589 (tons/day) * 365 (days/yr) = 579,985 tons/yr
Unmitigated Emission Factor, Ef = k*[(s/12)^a]*[(W/3)^b] (Equation 1a from AP-42 13.2.2)

	PM	PM_{10}	$PM_{2.5}$	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	2.6	2.6	2.6	% = mean % silt content of unpaved roads
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2)
W =	21.1	21.1	21.1	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365]
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM_{10}	$PM_{2.5}$	
Unmitigated Emission Factor, Ef =	4.04	0.91	0.09	lb/mile
Mitigated Emission Factor, Eext =	2.66	0.60	0.06	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM_{10} (tons/yr)	Unmitigated PTE of $PM_{2.5}$ (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM_{10} (tons/yr)	Mitigated PTE of $PM_{2.5}$ (tons/yr)
6-Wheel Vehicle (entering plant) (one-way trip)	2.95	0.66	0.07	1.94	0.44	0.04
6-Wheel Vehicle (leaving plant) (one-way trip)	2.95	0.66	0.07	1.94	0.44	0.04
10-Wheel Vehicle (entering plant) (one-way trip)	2.21	0.50	0.05	1.45	0.33	0.03
10-Wheel Vehicle (leaving plant) (one-way trip)	2.21	0.50	0.05	1.45	0.33	0.03
18-Wheel Vehicle (entering plant) (one-way trip)	5.90	1.33	0.13	3.88	0.87	0.09
18-Wheel Vehicle (leaving plant) (one-way trip)	5.90	1.33	0.13	3.88	0.87	0.09
	22.12	**4.99**	**0.50**	**14.54**	**3.28**	**0.33**

Methodology
Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
The mean % silt content of unpaved roads is from the EPA website http://www.epa.gov/ttn/chief/ap42/ch13/related/c13s02-2.html

Abbreviations
PM = Particulate Matter
PM_{10} = Particulate Matter (≤10 µm)
$PM_{2.5}$ = Particulate Matter (≤2.5 µm)
PTE = Potential to Emit

Appendix A: Emission Calculations
Storage Pile Wind Erosion

Company Name: Gavilon Grain, LLC
Source Address: 7646 North 125 East Shelburn, Indiana 47879
Permit Number: M153-32926-00038
Reviewer: C. Sullivan
Date: March 8, 2013

STORAGE PILE AREA	East Pile	West Pile	Total
Length (feet) =	500	500	
Width (feet) =	185	145	
Area (feet^2) =	92,500	72,500	
Conversion Factor (feet^2/acre) =	43,560		
Storage Pile Area (acres) =	2.12	1.66	3.79

STORAGE PILE WIND EROSION EMISSION FACTOR

Storage Pile Wind Erosion Emission Factor = E = 1.7*(s /1.5)*[(365 - p)/(235)]*(f /15)

From "Air Pollution Engineering Manual" by the Air and Waste Management Association, Edited by Anthony J. Buonicore and Wayne T. Davis, Van Nostrand Reinhold, New York,1992, Section 4 page 136. Fugitive Emissions, Storage-Pile Wind Erosion Equation 4.

Particle Size Multiplier PM =	1	From "Air Pollution Engineering Manual" by the Air and Waste Management Association, Edited by Anthony J. Buonicore and Wayne T. Davis, Van Nostrand Reinhold, New York, 1992, Section 4, page 136.
Particle Size Multiplier PM_{10} =	0.5	
Particle Size Multiplier $PM_{2.5}$ =	0.2	
Silt Content (s) =	2	Based on United States Department of Agriculture Foreign Matter limit for U.S. Number 1 grade grain for corn (7 CFR 810.404).
Number of Wet Days (p) =	120	From AP-42, Chapter 13, Section 13.2.1 Paved Roads, Figure 13.2.1-2. Mean number of days with 0.01 inch or more of precipitation in the United States (January 2011).
Unobstructed Wind Speed (%) (f) =	16.5	Percent of the time the unobstructed wind speed exceeds 12 miles per hour based on the Evansville/Dress Regional Airport (i.e. the closest meteorological station) data obtained from the SCRAM Surface Meteorological Archived Data 1984 to 1992 (http://www.epa.gov/scram001/surfacemetdata.htm).
Number of Days Pile is Uncovered =	365	Worst case estimate

	PM	PM_{10}	$PM_{2.5}$	
Storage Pile Wind Erosion Emission Factor =	2.60	1.30	0.52	lb/acre/day

WIND EROSION EMISSIONS FROM STORAGE PILES

PTE (tons/yr) = (Emission Factor (lb/acre/day)) * (Maximum Pile Size (acres)) * (Number of Days Pile is Uncovered) * (ton/2000 lbs)

	PTE PM (tons/year)	PTE PM_{10} (tons/year)	PTE $PM_{2.5}$ (tons/year)
Maximum Annual Wind Erosion Emissions	**1.80**	**0.90**	**0.36**

Abbreviations
lb = pound
PM = particulate matter
PM10 = particulate matter with a nominal aerodynamic diameter of 10 microns or less
PM2.5 = particulate matter with a nominal aerodynamic diameter of 2.5 microns or less
PTE = Potential to Emit

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Beth Pierson
Gavilon Grain, LLC
11 ConAgra Dr
Omaha, NE 68102

DATE: August 21, 2013

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

SUBJECT: Final Decision
MSOP
153-32926-00038

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:
Gene Reibel, 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.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Shelburn Public Library

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

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

Applicant Name: **Gavillon Grain**
Permit Number: **153-32926-00038**

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 6/13/2013

Mail Code 61-53

IDEM Staff	DPABST 8/26/2013 Gavilon Grain, LLC 153-32926-00038 (Final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Beth Pierson Gavilon Grain, LLC 11 ConAgra Dr Omaha NE 68102 (Source CAATS) (CONFIRM DELIVERY)									
2		Gene Reibel Region VP Gavilon Grain, LLC 11 ConAgra Dr Omaha NE 68102 *(RO CAATS)*									
3		Shelburn Town Council 25 N. Railroad Shelburn IN 47879 *(Local Official)*									
4		Sullivan County Health Department 31 N Court Street Sullivan IN 47882-1509 *(Health Department)*									
5		Sullivan County Commissioners 100 Courthouse Square Sullivan IN 47882-1593 *(Local Official)*									
6		Shelburn Public Library 17 West Griffith Box 10 Shelburn IN 47879 *(Library)*									
7		Mr. Richard Monday 545 E. Margaret Dr. Terre Haute IN 47801 *(Affected Party)*									
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