



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: September 5, 2013
RE: Select Seed / 015-33277-00037
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 OFFICE OF AIR QUALITY

**Select Seed
277 West State Road 218
Camden, Indiana 46917**

(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.: M015-33277-00037	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 5, 2013 Expiration Date: September 5, 2018

TABLE OF CONTENTS

A. SOURCE SUMMARY	4
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
B. GENERAL CONDITIONS.....	7
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability	
B.5 Severability	
B.6 Property Rights or Exclusive Privilege	
B.7 Duty to Provide Information	
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.9 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.12 Permit Renewal [326 IAC 2-6.1-7]	
B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.14 Source Modification Requirement	
B.15 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.17 Annual Fee Payment [326 IAC 2-1.1-7]	
B.18 Credible Evidence [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS.....	12
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Permit Revocation [326 IAC 2-1.1-9]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Instrument Specifications [326 IAC 2-1.1-11]	
Corrective Actions and Response Steps	
C.12 Response to Excursions or Exceedances	
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test	
Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]	
C.14 Malfunctions Report [326 IAC 1-6-2]	
C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]	
C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]	

[IC 13-14-1-13]

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 17

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

D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Annual Notification..... 20

Malfunction Report..... 21

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 elevator and seed processing operation.

Source Address:	277 West State Road 218, Camden, Indiana 46917
General Source Phone Number:	(574) 686-2743
SIC Code:	5191
County Location:	Carroll
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 internal grain handling operation, identified as Main Plant, with a potential annual throughput of 263,003 bushels per year, consisting of the following equipment:

Note: 1 bushel green corn = 72 pounds
1 bushel shelled corn = 52 pounds

- (1) One (1) enclosed drive-over truck receiving pit, identified as Receiving Pit #1, with a maximum capacity of 1,000 bushels per hour, constructed in 1978.
- (2) One (1) husking/sorting bed, identified as Husking Bed #1, with a maximum capacity of 1,000 bushels per hour, constructed in 1978.
- (3) One (1) silage chopper/loadout (to truck), identified as Chopper #1, with a maximum capacity of 50 bushels per hour, constructed in 2000.
- (4) One (1) corn sheller, identified as Sheller #1, with a maximum capacity of 800 bushels per hour, constructed in 1976.
- (5) One (1) beeswings loadout (to truck), identified as Beeswings Loadout, with a maximum capacity of 0.04 tons per hour, constructed in 1976.
- (6) One (1) corn cob loadout (to truck), identified as Cob Loadout, with a maximum capacity of 4.32 tons per hour, with exhaust controlled by cyclone C01, constructed in 1984.
- (7) One (1) shelled corn loadout (to truck), identified as Shelled Corn Loadout, with a maximum capacity of 1,000 bushels per hour, constructed in 1976.
- (8) One (1) drive-over receiving pit, identified as Rebagging Receiving, with a maximum capacity of 100 bags per hour, constructed in 1984.
- (9) One (1) bagging unit, identified as Rebagging Bagger #1, with a maximum capacity

of 100 bags/hr, constructed in 2003.

- (10) Ten (10) storage bins, specified as follows:

Emission Unit ID	Maximum Capacity (bu)	Installation Date
Sheller Surge Bin #1	650	1976
Shelled Corn Holding Bin #1	2500	
Shelled Corn Holding Bin #2		
Bulk Storage Bin #1	3000	1978
Bulk Storage Bin #2	6900	1980
Bulk Storage Bin #3		
Bulk Storage Bin #4		
Bulk Storage Bin #5		
Beeswing Storage Bin #1	2 tons	1976
Rebagging Storage Bin #1	50	1986

- (b) One (1) storage bin operation, identified as Storage Bin Site, with a potential annual throughput of 263,003 bushels per year, consisting of the following equipment:
- (1) Three (3) receiving and loadout augers, identified as Bin Site Augers #1-3, each with a maximum capacity of 1,200 bushels per hour, constructed in 1985, 1985, and 1998, respectively.
 - (2) Thirty (30) bulk storage bins, identified as Bulk Storage Bins #1-30, each with a maximum capacity of 4,000 bushels, constructed prior to 1970.
 - (3) Five (5) bulk storage bins, identified as Bulk Storage Bins #31-35, each with a maximum capacity of 3,000 bushels, two (2) constructed in 2003, and three (3) constructed in 2004.
- (c) One (1) seed processing and bagging operation, identified as Treatment and Bagging Building, with a potential annual throughput of 263,003 bushels per year, consisting of the following equipment:
- (1) One (1) enclosed drive-over receiving pit, identified as Receiving Pit #2, with a maximum capacity of 900 bushels per hour, constructed prior to 1970.
 - (2) One (1) grain cleaning operation, identified as Grain Cleaner #1, with a maximum capacity of 150 bushels per hour, constructed prior to 1970.
 - (3) Eight (8) grain graders, identified as Graders #1-8, each with a maximum capacity of 100 bushels per hour, each constructed in 1982.
 - (4) One (1) gravity table, identified as Gravity Table #1, with a maximum capacity of 300 bushels per hour, exhausting to baghouse B01, constructed in 1992.
 - (5) One (1) seed treatment operation, identified as Seed Treater #1, with a maximum capacity of 900 bushels per hour, constructed in 2008.
 - (6) One (1) aspirator, identified as Aspirator #1, with a maximum capacity of 900 bushels per hour, exhausting to baghouse B02, constructed in 1997.
 - (7) Two (2) bagging operations, identified as Bagger #1 and Bulk Bagger #1, each with a maximum capacity of 360 bushels per hour, each exhausting to baghouse B03, constructed in 1992 and 2004, respectively.

(8) Fourteen (14) storage bins, specified as follows:

Emission Unit ID	Maximum Capacity (bu)	Installation Date
Cleaner Storage Bin #1	850	Prior to 1970
Cleaner Discard Bin #1	50	
Grader Storage Bin #1	800	
Grader Storage Bin #2		
Grader Storage Bin #3	300	
Grader Storage Bin #4		
Grader Storage Bin #5		
Grader Storage Bin #6		
Gravity Discard Bin #1	180	1992
Bulk Discard Loadout Bin #1	650	1997
Treater Feed Storage Bin #1-2	150	
Bagging Bin #1	70	Prior to 1970

- (d) Two (2) natural gas-fired dryers, identified as Dryer #1 and #2, with a maximum capacity of 49.5 MMBtu per hour and 61.2 MMBtu per hour, respectively, each constructed in 1984. Dryer #2 was modified in 1989.
- (e) Two (2) diesel fuel storage tanks, identified as Tank #1 and #2, with a maximum capacity of 300 and 2,000 gallons, respectively.
- (f) One (1) diesel fuel dispensing facility
- (g) Paved and unpaved roads. [326 IAC 6-4]

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M015-33277-00037, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-3-3. 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) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to M015-33277-00037 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 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.8 Performance Testing [326 IAC 3-6]

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

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

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

- (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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 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.11 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.12 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.13 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.14 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.15 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.16 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) enclosed internal grain handling operation, identified as Main Plant, with a potential annual throughput of 263,003 bushels per year, consisting of the following equipment:

Note: 1 bushel green corn = 72 pounds; 1 bushel shelled corn = 52 pounds

- (1) One (1) enclosed drive-over truck receiving pit, identified as Receiving Pit #1, with a maximum capacity of 1,000 bushels per hour, constructed in 1978.
- (2) One (1) husking/sorting bed, identified as Husking Bed #1, with a maximum capacity of 1,000 bushels per hour, constructed in 1978.
- (3) One (1) silage chopper/loadout (to truck), identified as Chopper #1, with a maximum capacity of 50 bushels per hour, constructed in 2000.
- (4) One (1) corn sheller, identified as Sheller #1, with a maximum capacity of 800 bushels per hour, constructed in 1976.
- (5) One (1) beeswings loadout (to truck), identified as Beeswings Loadout, with a maximum capacity of 0.04 tons per hour, constructed in 1976.
- (6) One (1) corn cob loadout (to truck), identified as Cob Loadout, with a maximum capacity of 4.32 tons per hour, with exhaust controlled by cyclone C01, constructed in 1984.
- (7) One (1) shelled corn loadout (to truck), identified as Shelled Corn Loadout, with a maximum capacity of 1,000 bushels per hour, constructed in 1976.
- (8) One (1) drive-over receiving pit, identified as Rebagging Receiving, with a maximum capacity of 100 bags per hour, constructed in 1984.
- (9) One (1) bagging unit, identified as Rebagging Bagger #1, with a maximum capacity of 100 bags/hr, constructed in 2003.
- (10) Ten (10) storage bins, specified as follows:

Emission Unit ID	Maximum Capacity (bu)	Installation Date
Sheller Surge Bin #1	650	1976
Shelled Corn Holding Bin #1	2500	
Shelled Corn Holding Bin #2		
Bulk Storage Bin #1	3000	1978
Bulk Storage Bin #2	6900	1980
Bulk Storage Bin #3		
Bulk Storage Bin #4		
Bulk Storage Bin #5		
Beeswing Storage Bin #1	2 tons	1976
Rebagging Storage Bin #1	50	1986

(b) One (1) storage bin operation, identified as Storage Bin Site, with a potential annual throughput of 263,003 bushels per year, consisting of the following equipment:

- (1) Three (3) receiving and loadout augers, identified as Bin Site Augers #1-3, each with a maximum capacity of 1,200 bushels per hour, constructed in 1985, 1985, and 1998, respectively.
 - (2) Thirty (30) bulk storage bins, identified as Bulk Storage Bins #1-30, each with a maximum capacity of 4,000 bushels, constructed prior to 1970.
 - (3) Five (5) bulk storage bins, identified as Bulk Storage Bins #31-35, each with a maximum capacity of 3,000 bushels, 2 constructed in 2003, and 3 constructed in 2004.
- (c) One (1) seed processing and bagging operation, identified as Treatment and Bagging Building, with a potential annual throughput of 263,003 bushels per year, consisting of the following equipment:
- (1) One (1) enclosed drive-over receiving pit, identified as Receiving Pit #2, with a maximum capacity of 900 bushels per hour, constructed prior to 1970.
 - (2) One (1) grain cleaning operation, identified as Grain Cleaner #1, with a maximum capacity of 150 bushels per hour, constructed prior to 1970.
 - (3) Eight (8) grain graders, identified as Graders #1-8, each with a maximum capacity of 100 bushels per hour, each constructed in 1982.
 - (4) One (1) gravity table, identified as Gravity Table #1, with a maximum capacity of 300 bushels per hour, exhausting to baghouse B01, constructed in 1992.
 - (5) One (1) seed treatment operation, identified as Seed Treater #1, with a maximum capacity of 900 bushels per hour, constructed in 2008.
 - (6) One (1) aspirator, identified as Aspirator #1, with a maximum capacity of 900 bushels per hour, exhausting to baghouse B02, constructed in 1997.
 - (7) Two (2) bagging operations, identified as Bagger #1 and Bulk Bagger #1, each with a maximum capacity of 360 bushels per hour, each exhausting to baghouse B03, constructed in 1992 and 2004, respectively.
 - (8) Fourteen (14) storage bins, specified as follows:

Emission Unit ID	Maximum Capacity (bu)	Installation Date
Cleaner Storage Bin #1	850	Prior to 1970
Cleaner Discard Bin #1	50	
Grader Storage Bin #1	800	
Grader Storage Bin #2		
Grader Storage Bin #3	300	
Grader Storage Bin #4		
Grader Storage Bin #5		
Grader Storage Bin #6		
Gravity Discard Bin #1	180	1992
Bulk Discard Loadout Bin #1	650	
Treater Feed Storage Bin #1-2	150	1997
Bagging Bin #1	70	Prior to 1970

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

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

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

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

The following table shows the maximum process weight rate and 326 IAC 6-3-2 allowable particulate emission rate for each emission unit:

Unit ID	Maximum Process Weight (ton/hr)	326 IAC 6-3 Allowable PM Emission Rate (lb/hr)
Main Plant Receiving - Drive-over Pit	36.00	41.57
Husking/Sorting Bed	36.00	41.57
Bulk Ear Corn Dryers	5.40	12.69
Corn Sheller	28.80	38.96
Sheller Surge Bin	28.80	38.96
Shelled Corn Holding Bins	28.80	38.96
Bulk Storage Bins	28.80	38.96
Shelled Corn Loadout to Truck	26.00	36.38
Bin Site Receiving & Loadout - Augers	31.20	40.30
Bulk Storage Bins	31.20	40.30
Treatment/Bagging Receiving - Drive-over Pit	23.40	33.90
Cleaner Storage Bin	23.40	33.90
Grain Cleaner	3.90	10.20
Treater Feed Storage Bin	23.40	33.90
Seed Treater	23.40	33.90
Treater Storage Bins	23.40	33.90
Aspirator	23.40	33.90
Bagging Bin	23.40	33.90
Bulk Bagger	9.36	18.35
Bagger	9.36	18.35

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the Bulk Ear Corn Dryers (Dryer #1 and #2), Seed Treater, and baghouses B01, B02, and B03. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Select Seed
Address:	277 West State Road 218
City:	Camden, Indiana 46917
Phone #:	(574) 686-2743
MSOP #:	M015-33277-00037

I hereby certify that Select Seed is :

I hereby certify that Select Seed is :

- still in operation.
- no longer in operation.
- in compliance with the requirements MSOP M015-33277-00037.
- not in compliance with the requirements of MSOP M015-33277-00037.

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

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

Noncompliance:

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management Office of Air Quality

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

Source Description and Location

Source Name:	Select Seed
Source Location:	277 W State Road 218, Camden, IN 46917
County:	Carroll
SIC Code:	5191 (Farm Supplies)
Operation Permit No.:	M015-33277-00037
Permit Reviewer:	Donald McQuigg

On June 5, 2013, the Office of Air Quality (OAQ) received an application from Select Seed related to the transition of a FESOP to a MSOP for an existing grain elevator and seed processing operation.

Source Definition

Select Seed, a division of Growmark, Inc. has three plants in Camden, Indiana. The main plant is located at 277 West State Road 218, the storage bin plant is located at 1145 East County Road 400 North and the bagging plant is located at 110 East Main Street. IDEM, OAQ has examined whether these plants are part of the same major source. The term "major source" is defined at 326 IAC 2-7-1(22). In order for two or more plants to be considered one major source, they must meet all three of the following criteria:

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

The three plants are owned and operated by Select Seed, a division of Growmark, Inc. Therefore, all three plants are under common ownership and the first part of the major source definition is met.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant. All three plants have the same two-digit SIC Code, 51, for the major group Wholesale Trade-Nondurable Goods, which includes the wholesale distribution of seeds and other farm supplies.

A plant is a support facility to another plant if it dedicates 50% or more of its output to another plant. The main plant sends 100% of its output to each of the other two plants, at different times in the process. The bagging plant and the storage bin plant each get 50% of the main plant's total output. Therefore, the bagging plant and the storage plant each have a support relationship with the main plant. In addition, all three plants have the same two-digit SIC Code. The second part of the major source definition is met for all three plants.

The last part of the definition is whether the plants are on the same, contiguous or adjacent properties. None of the plants are located on the same or contiguous properties. Therefore, IDEM must determine if the plants are located on properties that are adjacent to each other.

The term "adjacent" is not defined in Indiana's rules. IDEM's NPD Air-005 is guidance for applying the definition of "major source" in 326 IAC 2-7-1(22). NPD Air-005 adds the following guidance:

- properties that actually abut at any point would satisfy the requirement of contiguous or adjacent property.
- properties that are separated by a public road or public property would satisfy this requirement, absent special circumstances.
- other scenarios would be examined on an individual basis with the focus on the distance between the activities and the relationship between the activities.

The U.S. EPA has a similar view on how to interpret the term “adjacent” when defining a source. Two U.S. EPA letters; the May 21, 1988 letter from U.S. EPA Region 8 to the Utah Division of Air Quality, and the U.S. EPA Region 5 letter dated October 18, 2010 to Scott Huber at Summit Petroleum Corporation, discuss the term “adjacent” as it is used in making major source determinations. These letters are not binding on IDEM but they are persuasive for two reasons. The letters follow the guidance in NPD Air-005 that IDEM will examine both the distance between the sources and their relationship and, secondly, they illustrate a longstanding U.S. EPA analysis used to determine if two sources are “adjacent” going back to the preamble to the 1980 NSR program definition of “major source”. U.S. EPA’s consistent approach is that any evaluation of what is “adjacent” must relate to the guiding principal of a common sense notion of “source”.

All IDEM evaluations of adjacency are done on a case-by-case basis looking at the specific factors for the plants involved. In addition to determining the distance between the plant properties, IDEM asks:

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

These questions focus on whether the separate sources are so interrelated that they are functioning as one plant, and whether the distance between them is small enough that it enables them to operate as one plant. U.S. EPA Assistant Administrator Gina McCarty issued a memorandum on September 22, 2009 that confirmed U.S. EPA’s view that each source determination must be done on a case-by-case basis and stated that after that analysis is completed it may be that physical proximity serves as an overwhelming factor in determining if the plants are adjacent.

The main plant property is less than 5000 feet from the storage bin plant property. Seeds are routinely transferred from the main plant to the storage bin plant as part of the production process. The plants share a common workforce, as the same employees are common to all three plants and travel between the plants as needed both during and after harvest. The two plants are physically near each other. For these reasons IDEM, OAQ finds that the main plant and the storage bin plant are located on adjacent properties, meeting the third part of the major source definition.

The main plant property is less than 1400 feet from the bagging plant property. Seeds are routinely transferred from the main plant to the bagging plant for treatment and bagging, as part of the production process. The plants share a common workforce, as the same employees are common to all three plants and travel between the plants as needed both during and after harvest. The two plants are physically close to each other. For these reasons IDEM, OAQ finds that the main plant and the bagging plant are located on adjacent properties, meeting the third part of the major source definition.

All three plants; the main plant, the storage bin plant and the bagging plant, meet all three elements of the major source definition. IDEM, OAQ finds that all three plants are part of the same major source.

Existing Approvals

The source has been operating under a Federally Enforceable State Operating Permit (FESOP) No. F015-33277-00037, issued on March 11, 2013.

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

County Attainment Status

The source is located in Carroll 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.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
 Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

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

Fugitive Emissions

- (a) 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.
- (b) 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.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Select Seed on June 5, 2013, relating to the removal of two (2) diesel-fired engines, identified as Engine #1 and Engine #2. The updated source uncontrolled/unlimited potential to emit (PTE) to reflect the removal of the two diesel engines is less than major source permitting thresholds. Therefore, the source has requested to transition from a FESOP to a MSOP.

The source consists of the following permitted emission units:

- (a) One (1) enclosed internal grain handling operation, identified as Main Plant, with a potential annual throughput of 263,003 bushels per year, consisting of the following equipment:

Note: 1 bushel green corn = 72 pounds; 1 bushel shelled corn = 52 pounds

- (1) One (1) enclosed drive-over truck receiving pit, identified as Receiving Pit #1, with a maximum capacity of 1,000 bushels per hour, constructed in 1978.
- (2) One (1) husking/sorting bed, identified as Husking Bed #1, with a maximum capacity of 1,000 bushels per hour, constructed in 1978.
- (3) One (1) silage chopper/loadout (to truck), identified as Chopper #1, with a maximum capacity of 50 bushels per hour, constructed in 2000.
- (4) One (1) corn sheller, identified as Sheller #1, with a maximum capacity of 800 bushels per hour, constructed in 1976.
- (5) One (1) beeswings loadout (to truck), identified as Beeswings Loadout, with a maximum capacity of 0.04 tons per hour, constructed in 1976.
- (6) One (1) corn cob loadout (to truck), identified as Cob Loadout, with a maximum capacity of 4.32 tons per hour, with exhaust controlled by cyclone C01, constructed in 1984.
- (7) One (1) shelled corn loadout (to truck), identified as Shelled Corn Loadout, with a maximum capacity of 1,000 bushels per hour, constructed in 1976.
- (8) One (1) drive-over receiving pit, identified as Rebagging Receiving, with a maximum capacity of 100 bags per hour, constructed in 1984.
- (9) One (1) bagging unit, identified as Rebagging Bagger #1, with a maximum capacity of 100 bags/hr, constructed in 2003.
- (10) Ten (10) storage bins, specified as follows:

Emission Unit ID	Maximum Capacity (bu)	Installation Date
Sheller Surge Bin #1	650	1976
Shelled Corn Holding Bin #1	2500	
Shelled Corn Holding Bin #2		
Bulk Storage Bin #1	3000	1978
Bulk Storage Bin #2	6900	1980
Bulk Storage Bin #3		
Bulk Storage Bin #4		
Bulk Storage Bin #5		
Beeswing Storage Bin #1	2 tons	1976
Rebagging Storage Bin #1	50	1986

- (b) One (1) storage bin operation, identified as Storage Bin Site, with a potential annual throughput of 263,003 bushels per year, consisting of the following equipment:
- (1) Three (3) receiving and loadout augers, identified as Bin Site Augers #1-3, each with a maximum capacity of 1,200 bushels per hour, constructed in 1985, 1985, and 1998, respectively.

- (2) Thirty (30) bulk storage bins, identified as Bulk Storage Bins #1-30, each with a maximum capacity of 4,000 bushels, constructed prior to 1970.
 - (3) Five (5) bulk storage bins, identified as Bulk Storage Bins #31-35, each with a maximum capacity of 3,000 bushels, two (2) constructed in 2003, and three (3) constructed in 2004.
- (c) One (1) seed processing and bagging operation, identified as Treatment and Bagging Building, with a potential annual throughput of 263,003 bushels per year, consisting of the following equipment:
- (1) One (1) enclosed drive-over receiving pit, identified as Receiving Pit #2, with a maximum capacity of 900 bushels per hour, constructed prior to 1970.
 - (2) One (1) grain cleaning operation, identified as Grain Cleaner #1, with a maximum capacity of 150 bushels per hour, constructed prior to 1970.
 - (3) Eight (8) grain graders, identified as Graders #1-8, each with a maximum capacity of 100 bushels per hour, each constructed in 1982.
 - (4) One (1) gravity table, identified as Gravity Table #1, with a maximum capacity of 300 bushels per hour, exhausting to baghouse B01, constructed in 1992.
 - (5) One (1) seed treatment operation, identified as Seed Treater #1, with a maximum capacity of 900 bushels per hour, constructed in 2008.
 - (6) One (1) aspirator, identified as Aspirator #1, with a maximum capacity of 900 bushels per hour, exhausting to baghouse B02, constructed in 1997.
 - (7) Two (2) bagging operations, identified as Bagger #1 and Bulk Bagger #1, each with a maximum capacity of 360 bushels per hour, each exhausting to baghouse B03, constructed in 1992 and 2004, respectively.
 - (8) Fourteen (14) storage bins, specified as follows:

Emission Unit ID	Maximum Capacity (bu)	Installation Date
Cleaner Storage Bin #1	850	Prior to 1970
Cleaner Discard Bin #1	50	
Grader Storage Bin #1	800	
Grader Storage Bin #2		
Grader Storage Bin #3	300	
Grader Storage Bin #4		
Grader Storage Bin #5		
Grader Storage Bin #6		
Gravity Discard Bin #1	180	1992
Bulk Discard Loadout Bin #1	650	
Treater Feed Storage Bin #1-2	150	1997
Bagging Bin #1	70	Prior to 1970

- (d) Two (2) natural gas-fired dryers, identified as Dryer #1 and #2, with a maximum capacity of 49.5 MMBtu per hour and 61.2 MMBtu per hour, respectively, each constructed in 1984. Dryer #2 was modified in 1989.
- (e) Two (2) diesel fuel storage tanks, identified as Tank #1 and #2, with a maximum capacity of 300 and 2,000 gallons, respectively.

- (f) One (1) diesel fuel dispensing facility
- (g) Paved and unpaved roads. [326 IAC 6-4]

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	14.69
PM ₁₀ ⁽¹⁾	7.74
PM _{2.5}	4.24
SO ₂	0.29
NO _x	47.54
VOC	7.01
CO	39.93
GHG as CO ₂ e	57,390

(1) 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) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

Single Largest HAP	Potential To Emit (tons/year)
Hexane	0.86
TOTAL HAPs	1.41

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of all criteria pollutants are each less than one hundred (100) tons per year, but the emissions of CO and NO_x are greater than 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) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHG) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

Compliance Assurance Monitoring (CAM)

- (a) 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.

New Source Performance Standards (NSPS)

- (b) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Storage Vessels for which Construction, Reconstruction, or Modification Commenced After July 23, 1984, are not included in the permit because each of the two (2) storage tanks, identified as Tank #1 and Tank #2, has a capacity less than seventy-five (75) cubic meters (m³) (19,813 gallons). In addition, pursuant to 40 CFR 60.110b(b), each storage tank is not subject to this rule since each stores diesel fuel, which has a true vapor pressure of 0.152 kPa (AP-42 Table 7.1-2).
- (c) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD, are not included in this permit because the source has a permanent storage capacity less than 2.5 million U.S. bushels. The permanent storage capacity of the source is 200,000 U.S. bushels.
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (g) 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 for the natural gas-fired dryers, because this source is not a major source of HAPs.
- (h) 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, are not included in the permit renewal, because the source does not have any boilers. This source only contains natural gas fired grain dryers.
- (i) 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 processes seed corn.
- (j) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

State Rule Applicability Determination

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHG) is less than 100,000 tons of CO₂e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to 326 IAC 6-5 because it has fugitive particulate emissions of less than twenty-five (25) tons per year and is not located in a nonattainment area.
- (h) 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 Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne County.
- (i) 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.
- (j) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Individual Facilities

Grain Elevator

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are applicable to each of the units listed in the table below, since each unit has potential particulate emissions greater than five hundred fifty-one thousandths (0.551) pound per hour. 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 of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

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 for specific emission units and the allowable rate of emissions calculated for that process weight. The corn processed at this facility is estimated to weigh 52 (shelled corn) or 72 (green corn) pounds per bushel.

Unit ID	Maximum Process Weight Rate (ton/hr)	326 IAC 6-3 Allowable Particulate Emission Rate (lb/hr) for each unit
Main Plant Receiving - Drive-over Pit	36.00	41.57
Husking/Sorting Bed	36.00	41.57
Bulk Ear Corn Dryers	5.40	12.69
Corn Sheller	28.80	38.96
Sheller Surge Bin	28.80	38.96
Shelled Corn Holding Bins	28.80	38.96
Bulk Storage Bins	28.80	38.96
Shelled Corn Loadout to Truck	26.00	36.38
Bin Site Receiving & Loadout - Augers	31.20	40.30
Bulk Storage Bins	31.20	40.30
Treatment/Bagging Receiving - Drive-over Pit	23.40	33.90
Cleaner Storage Bin	23.40	33.90
Grain Cleaner	3.90	10.20
Treater Feed Storage Bin	23.40	33.90
Seed Treater	23.40	33.90
Treater Storage Bins	23.40	33.90
Aspirator	23.40	33.90
Bagging Bin	23.40	33.90
Bulk Bagger	9.36	18.35
Bagger	9.36	18.35

Calculations based on AP-42 emission factors indicate that each of the emission units is able to comply with the limits provided in the table above without the use of a control device. The source uses enclosed operations, baghouses, and a cyclone to ensure compliance with the 326 IAC 6-3-2 limits.

Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable to each of the units listed in the table below, since each unit has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Unit ID
Silage chopper/loadout
Beeswings Storage Bin
Bees Wings Loadout
Cob Loadout to Truck w/ Cyclone
Rebagging Receiving

Rebagging Storage Bin
Rebagging Bagger
Cleaner Discard Bin
Graders
Graders Storage Bins
Gravity Table
Gravity Discard Bin
Bulk Discard Loadout Bin

Natural Gas-fired Dryers

- (b) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)
The natural gas-fired grain dryers are not subject to the requirements of 326 IAC 6-2, because they are not indirect heating units.
- (c) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1, the natural gas-fired grain dryers are not subject to the requirements of 326 IAC 7-1.1, since they each have unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.
- (d) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The natural gas-fired grain dryers are not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

Compliance Determination, Monitoring and Testing Requirements
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There are no compliance determinations or monitoring requirements applicable to this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 5, 2013.

The operation of this source shall be subject to the conditions of the attached proposed Minor Source Operating Permit (MSOP) No. M015-33277-00037. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Donald McQuigg at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-4240 or toll free at 1-800-451-6027 extension 4-4240.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**TSD Appendix A: Emissions Calculations
Source Emissions Summary**

Company Name: Select Seed
Address City IN Zip: 277 West State Road 218, Camden, IN 46917
Minor Source Operating Permit No.: M015-33277-00037
Reviewer: Donald McQuigg
Date: June 20, 2013

Process description	Unlimited/Uncontrolled Potential to Emit (tons/year)*									
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHG as CO ₂ e	Total HAPs	Worst Single HAP
Non-Fugitive Emissions										
Grain Elevator (grain receiving, handling, storage and shipping)	11.59	3.54	0.57	-	-	-	-	-	-	-
Natural Gas Dryers	0.90	3.61	3.61	0.29	47.54	2.61	39.93	57,390	0.90	0.86 (hexane)
Seed Treatment	-	-	-	-	-	4.40	-	-	0.52	0.52 (methanol)
Storage Tanks	-	-	-	-	-	1.88E-03	-	-	-	-
Total Non-Fugitive Emissions	12.49	7.15	4.18	0.29	47.54	7.01	39.93	57,390	1.41	0.86 (hexane)
Fugitive Emissions										
Unpaved Roads**	2.191	0.591	0.059	-	-	-	-	-	-	-
Paved Roads**	0.005	0.001	0.000	-	-	-	-	-	-	-
Total Fugitive Emissions	2.20	0.59	0.06	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Non-Fugitive and Fugitive Emissions	14.69	7.74	4.24	0.29	47.54	7.01	39.93	57,390	1.41	0.86 (hexane)

Notes

*Potential to Emit (PTE) is based on rated capacity at 8,760 hours/year.
 **Mitigated PTE (tons/yr) is taking natural mitigation due to precipitation into consideration.

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

Company Name: Select Seed
Address City IN Zip: 277 West State Road 218, Camden, IN 46917
Minor Source Operating Permit No.: M015-33277-00037
Reviewer: Donald McQuigg
Date: June 20, 2013

Bulk Density of Green Corn = 72 lbs/bushel
Bulk Density of Shelled Corn = 52 lbs/bushel

1. Potential Annual Throughput Calculation

Year	Grain Received	
	(bushels/yr)	(tons/yr)
2007	219,169	7,890
2008	166,773	6,004
2009	68,882	2,480
2010	90,974	3,275
2011	90,880	3,272

	(bushels/yr)	(tons/yr)
Annual Maximum Throughput	219,169	7,890
Potential Annual Throughput Green Corn	263,003	9,468
Potential Annual Throughput Shelled Corn	263,003	6,838

2. PTE Calculations

Emissions Unit Description	Maximum Grain Throughput (tons/yr)	Uncontrolled Emission Factors (lbs/ton)			Control Device(s)	Collection and Control Efficiency (%)	PTE Before Control (tons/yr)			PTE After Control (tons/yr)		
		PM	PM10	PM2.5			PM	PM10	PM2.5	PM	PM10	PM2.5
Receiving - Straight Truck - Green Corn ¹	9,468	0.18	0.059	0.010	None	50%	0.43	0.14	0.02	0.43	0.14	0.02
Receiving - Straight Truck - Shelled Corn ¹	6,838	0.36	0.118	0.020	None	0%	1.23	0.40	0.07	1.23	0.40	0.07
Maximum Receiving							1.66	0.54	0.09	1.66	0.54	0.09
Grain Cleaning - Corn Sheller	9,468	0.75	0.19	0.032	None	0%	3.55	0.90	0.15	3.55	0.90	0.15
Grain Cleaning - Grain Cleaner	6,838	0.75	0.19	0.032	None	0%	2.56	0.65	0.11	2.56	0.65	0.11
Grain Cleaning - Aspirator	6,838	0.075	0.019	0.0032	B02	98%	0.26	0.06	0.01	0.01	1.30E-03	2.19E-04
Total Grain Cleaning							6.37	1.61	0.27	6.12	1.55	0.26
Grain Drying - Column Dryer	6,838	0.22	0.055	0.0094		0%	0.75	0.19	0.03	0.75	0.19	0.03
Total Grain Drying							0.75	0.19	0.03	0.75	0.19	0.03
Headhouse and Grain Handling - Husking/Sorting Bed ²	9,468	0.061	0.034	0.0058	None	50%	0.14	0.08	0.01	0.14	0.08	0.01
Headhouse and Grain Handling - Transfers, Grader, Treater ²	6,838	0.3111	0.1734	0.0296	None	0%	1.06	0.59	0.10	1.06	0.59	0.10
Headhouse and Grain Handling - Gravity Table	6,838	0.061	0.034	0.0058	B01	90%	0.21	0.12	0.02	0.02	0.01	1.98E-03
Total Headhouse and Grain Handling							1.42	0.79	0.13	1.23	0.68	0.12
Storage - Bins ³	6,838	0.225	0.0567	0.00099	None	0%	0.77	0.19	0.00	0.77	0.19	3.38E-03
Total Storage							0.77	0.19	0.00	0.77	0.19	3.38E-03
Shipping and Packaging - Shelled Corn Loadout - Main Plant	6,838	0.086	0.029	0.0049	None	0%	0.29	0.10	0.02	0.29	0.10	0.02
Shipping and Packaging - Silage Loadout ^{4,5}	237	0.086	0.029	0.0049	None	50%	0.01	1.72E-03	2.90E-04	0.01	1.72E-03	2.90E-04
Shipping and Packaging - Cob Loadout - Main Plant ⁶	710	0.086	0.029	0.0049	C01	90%	0.03	0.01	1.74E-03	3.05E-03	1.03E-03	1.74E-04
Shipping and Packaging - Beeswing Loadout - Main Plant ⁷	14	0.086	0.029	0.0049	None	0%	6.11E-04	2.06E-04	3.48E-05	6.11E-04	2.06E-04	3.48E-05
Shipping and Packaging - Packaging	6,838	0.086	0.029	0.0049	B03	98%	0.29	0.10	0.02	0.01	1.98E-03	3.35E-04
Total Packaging							0.62	0.21	0.04	0.31	0.10	0.02
Totals							11.59	3.54	0.57	10.84	3.26	0.52

All operations are enclosed within buildings.

¹Receiving - Straight Truck - Shelled Corn includes receiving at the main plant and the treatment/bagging building. The overall adjustment factor is 1.

²Headhouse and Grain Handling - Transfers, Grader, Treater include enclosed internal transfers (adjusted by a factor of 3.1), grader, and seed treater. The overall adjustment factor is 5.

³Storage - Bins include transfer to up to 9 storage bins. The overall adjustment factor is 1.

⁴Receiving - Straight Truck - Green Corn, Headhouse and Grain Handling - Husking/Sorting Bed, and Shipping and Packaging - Silage Loadout each include 50% control for inherent moisture.

⁵Shipping and Packaging - Silage Loadout, Cob Loadout, Beeswing Loadout: AP-42 does not have an emission factor for silage chopper/loadout or cob loadout. Therefore, it was estimated that silage chopper/loadout and cob loadout will have 50% less PM emissions than the truck loadout. Assumed 5% of the green corn throughput is silage, and assumed 15% of the throughput is cobs going out. Assumed 1% of cob is beeswings.

Methodology

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

[Potential Annual Throughput Green Corn (tons/yr)] = [Annual Maximum Throughput (bu/yr)] * [Adjustment Factor (1.2)] * [72 (lbs/bu)] / [2000 (lbs/ton)]

[Potential Annual Throughput Shelled Corn (tons/yr)] = [Annual Maximum Throughput (bu/yr)] * [Adjustment Factor (1.2)] * [52 (lbs/bu)] / [2000 (lbs/ton)]

PTE of PM/PM10/PM2.5 Before Control (tons/yr) = [Potential Annual Throughput Green Corn (tons/yr)] OR [Potential Annual Throughput Shelled Corn (tons/yr)] * [Emission factor (lb/ton)] / [2000 (lbs/ton)]

PTE of PM/PM10/PM2.5 After Control (tons/yr) = [Potential Annual Throughput Green Corn (tons/yr)] OR [Potential Annual Throughput Shelled Corn (tons/yr)] * [Emission factor (lb/ton)] / [2000 (lbs/ton)] * [1 - Control Efficiency (%)]

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

Company Name: Select Seed
Address City IN Zip: 277 West State Road 218, Camden, IN 46917
Minor Source Operating Permit No.: M015-33277-00037
Reviewer: Donald McQuigg
Date: June 20, 2013

Unit	Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
Dryer #1	49.5	1020	425.12
Dryer #2	61.2	1020	525.60
Totals	110.70		950.72

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMcf	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.90	3.61	3.61	0.285	47.54	2.61	39.93

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

Hazardous Air Pollutants	HAPs - Organics*					HAPs - Metals*				
	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.0E-03	5.7E-04	3.6E-02	8.6E-01	1.6E-03	2.4E-04	5.2E-04	6.7E-04	1.8E-04	1.0E-03

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

Methodology

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

Potential to Emit Total HAPs (tons/year) = 0.90

Greenhouse Gases (GHGs)

Greenhouse Gas (GHG)	Greenhouse Gas (GHG)		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	57043.06	1.09	1.05
Summed Potential Emissions in tons/yr	57045		
CO2e Total in tons/yr	57390		

Methodology

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

Abbreviations

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

**Appendix A: Emission Calculations
Seed Treaters**

Company Name: Select Seed
Address City IN Zip: 277 West State Road 218, Camden, IN 46917
Minor Source Operating Permit No.: M015-33277-00037
Reviewer: Donald McQuigg
Date: June 20, 2013

Emission Unit	Seed Additive ¹	Additive Properties ²				Seed Production Data	Additive Usage Data ³				Uncontrolled VOC Emissions	
		Constituent	% by Weight	Density (lb/gal)	Emission factor (lb/gal)		Annual Capacity (ton/yr)	Seed Additive Usage (oz./cwt)	Seed Additive Usage (oz./ton)	Annual Capacity (gal/yr)	2007 Usage (gal/yr)	PTE (ton/yr)
Worst-Case VOC Corn Seed Treatment	Acceleron DC-509	VOC	5.80	9.26	0.54	6,838	0.09	1.70	91	76	0.02	0.02
	Acceleron DC-309	VOC	5.80	9.18	0.53	6,838	0.10	2.00	107	89	0.03	0.02
	Acceleron DX-709	VOC	5.80	9.10	0.53	6,838	0.32	6.40	342	285	0.09	0.08
	Prism Emerald Seed Colorant	VOC	1.07	9.68	0.10	6,838	0.60	12.00	641	534	0.03	0.03
	Precise Seed Finisher 1006	VOC	0.00	9.35	0.00	6,838	4.00	80.00	4,274	3,562	0.00	0.00
	Acceleron IC-609	VOC	5.80	10.43	0.61	6,838	13.06	261.20	13,954	11,628	4.22	3.52
	Poncho Votivo	VOC	0.00	10.35	0.00	6,838	0.00	0.00	0	0	0.00	0.00
Total											4.40	3.66

Emission Unit	Seed Additive ¹	Additive Properties ²				Seed Production Data	Additive Usage Data ³				Uncontrolled HAP Emissions	
		Constituent	% by Weight	Density (lb/gal)	Emission factor (lb/gal)		Annual Capacity (ton/yr)	Seed Additive Usage (oz./cwt)	Seed Additive Usage (oz./ton)	Annual Capacity (gal/yr)	2007 Usage (gal/yr)	PTE (ton/yr)
Worst-Case HAP Corn Seed Treatment ⁴	Maxim Quattro	VOC	5.80	9.39	0.54	6,838	1.05	20.96	1,120	933	-	-
	Cruiser 5FS	VOC	2.60	10.77	0.28	6,838	2.61	52.16	2,787	2,322	-	-
	Prism Emerald Seed Colorant	VOC	1.07	9.68	0.10	6,838	0.67	13.32	712	593	-	-
	Flo Rite 1197	HAP	4.00	9.18	0.37	6,838	2.64	52.80	2,821	2,351	0.52	0.43
	Flo Rite 1197	VOC	4.00	9.18	0.37	6,838	2.64	52.80	2,821	2,351	-	-
Total											0.52	0.43

Note 1: Seed treater recipes obtained during 5/10/12 site visit, with clarifications provided in 6/28/12 email from client.

Note 2: Additive properties obtained from seed treater MSDSs and manufacturer contacts.

Note 3: Additive usage (oz./cwt) from seed treater recipes obtained during 5/10/12 site visit.

Note 4: The worst-case HAP corn seed treatment consists of a mixture of the seed additives listed.

Methodology

Emission factor (lb/gal) = Density (lb/gal) * Constituent (% by wt)

Seed Production Annual Capacity (ton/yr) = Past 5 Year Max Grain Throughput (ton/yr) * 1.2

Seed Additive Usage (ounce/ton) = Seed Additive Usage (oz/cwt) * (1 cwt/100 lbs) * (2,000 lb/ton)

Additive Usage Annual Capacity (gal/year) = Seed Production Annual Capacity (ton/yr) * Seed Additive Usage (ounce/ton) * Conversion Factor (1 gal / 128 ounces)

Potential VOC/HAP Emissions (ton/year) = Seed Additive Annual Capacity (gal/year) * Emission Factor (lb/gal) * Conversion Factor (1 ton /2,000 lbs)

2007 Actual VOC/HAP Emissions (ton/year) = 2007 Usage (gal/year) * Emission factor (lb/gal) * Conversion Factor (1 ton /2,000 lbs)

**Appendix A: Emission Calculations
Storage Tanks VOC Emissions**

Company Name: Select Seed
Address City IN Zip: 277 West State Road 218, Camden, IN 46917
Minor Source Operating Permit No.: M015-33277-00037
Reviewer: Donald McQuigg
Date: June 20, 2013

Storage Tank Potential Fugitive VOC Emissions

Tank Description	Quantity	Volume (gal)	Contains VOC?	Throughput¹ (gal/yr)	TANKS 4.0 VOC Emissions (tpy)
Diesel Tank - 300 gal	1	300	Yes	109,500	2.45E-04
Diesel Tank - 2,000 gal	1	2,000	Yes	730,000	1.63E-03
Total					1.88E-03

¹ Assume 1 turnover per day for each tank.

Methodology

Total Loss calculated from EPA TANKS 4.0.9d program.

Total emissions (tons/year) = Total Loss of four tanks (lbs/year) / 2000

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Select Seed
 Address City IN Zip: 277 West State Road 218, Camden, IN 46917
 Minor Source Operating Permit No.: M015-33277-00037
 Reviewer: Donald McQuigg
 Date: June 20, 2013

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 (11/2006).

Maximum Annual Production (Green Corn)	263,003	bu/yr
Maximum Annual Production (Green Corn)	9,468	ton/yr
Maximum Annual Grain Product (Shelled Corn)	6,838	ton/yr
2007 Actual Grain Received	219,169	bu/yr

Process	Vehicle Type	Maximum Weight of Vehicle (ton)	Maximum Weight of Load (ton)	Maximum Weight of Vehicle and Load (ton/trip)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)	Maximum one-way distance (miles/trip)	Maximum one-way miles (miles/yr)
Main Plant - Green Corn Unloading Entering Full	Truck	17.5	22.5	40.0	421	16,832	1,140	0.22	91
Main Plant - Green Corn Unloading Leaving Empty	Truck	17.5	0.0	17.5	421	7,364	1,960	0.37	156
Main Plant - Shelled Corn and Waste Loadout Entering Empty	Truck	17.5	0.0	17.5	473	8,285	1,150	0.22	103
Main Plant - Shelled Corn and Waste Loadout Leaving Full	Truck	17.5	20.0	37.5	473	17,753	1,450	0.27	130
Main Plant - Warehouse Dropoff Entering Full	Truck	17.5	20.0	37.5	342	12,821	400	0.08	26
Main Plant - Warehouse Dropoff Leaving Empty	Truck	17.5	0.0	17.5	342	5,983	400	0.08	26
Bin Site - Unloading Entering Full	Truck	17.5	20.0	37.5	342	12,821	315	0.06	20
Bin Site - Unloading Leaving Empty	Truck	17.5	0.0	17.5	342	5,983	470	0.09	30
Bin Site - Loadout Entering Empty	Truck	17.5	0.0	17.5	342	5,983	315	0.06	20
Bin Site - Loadout Leaving Full	Truck	17.5	20.0	37.5	342	12,821	470	0.09	30
Bagging - Shelled Corn Dropoff Entering Full	Truck	17.5	20.0	37.5	342	12,821	180	0.03	12
Bagging - Shelled Corn Dropoff Leaving Empty	Truck	17.5	0.0	17.5	342	5,983	180	0.03	12
Bagging - Treated Corn and Bulk Discard Pickup Entering Empty	Truck	17.5	0.0	17.5	342	5,983	180	0.03	12
Bagging - Treated Corn and Bulk Discard Pickup Leaving Full	Truck	17.5	20.0	37.5	342	12,821	180	0.03	12
Main Plant - Employee Vehicles	Cars	1.5	0.0	1.5	10,080	15,120	270	0.05	515
Total					15,287	159,377			1,196

Notes:

For Main Plant assume 33 employees during 4 months of production (20 work days per month), 15 employees during the off-season, and 2 trips per employee per day. No permanent employees at Bin Site. Bagging Employees use street parking.

Main Plant Shelled Corn and Waste Loadout includes shelled corn, silage, cob, and bees wings truck traffic. Total material shipped is conservatively estimated as the amount of green corn received.

Average Vehicle Weight Per Trip = $\frac{10.4}{0.078}$ tons/trip
 Average Miles Per Trip = $\frac{10.4}{0.078}$ miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	6.4	6.4	6.4	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 municipal solid waste landfills plant road)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2)
W =	10.4	10.4	10.4	tons = average vehicle weight
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, $E_{ext} = E_f \cdot [(365 - P)/365]$

Mitigated Emission Factor, $E_{ext} = E_f \cdot [(365 - P)/365]$
 where P = 123 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f	5.53	1.49	0.15	lb/mile
Mitigated Emission Factor, E_{ext}	3.66	0.99	0.10	lb/mile
Dust Control Efficiency	80%	80%	80%	Speed Limit of 15 mph

OEPA RACM Guide (Section 2.1.1)

Process	Vehicle Type	Unmitigated PTE of PM (ton/yr)	Unmitigated PTE of PM10 (ton/yr)	Unmitigated PTE of PM2.5 (ton/yr)	Mitigated PTE of PM (ton/yr)	Mitigated PTE of PM10 (ton/yr)	Mitigated PTE of PM2.5 (ton/yr)	Controlled PTE of PM (ton/yr)	Controlled PTE of PM10 (ton/yr)	Controlled PTE of PM2.5 (ton/yr)	2007 Actual PM (tons/yr)	2007 Actual PM10 (tons/yr)	2007 Actual PM2.5 (tons/yr)
Main Plant - Green Corn Unloading Entering Full	Grain truck	0.25	0.07	0.01	0.17	0.04	0.00	0.03	0.01	0.00	0.03	0.01	0.00
Main Plant - Green Corn Unloading Leaving Empty	Grain truck	0.43	0.12	0.01	0.29	0.08	0.01	0.06	0.02	0.00	0.05	0.01	0.00
Main Plant - Shelled Corn and Waste Loadout Entering Empty	Grain truck	0.28	0.08	0.01	0.19	0.05	0.01	0.04	0.01	0.00	0.03	0.01	0.00
Main Plant - Shelled Corn and Waste Loadout Leaving Full	Grain truck	0.36	0.10	0.01	0.24	0.06	0.01	0.05	0.01	0.00	0.04	0.01	0.00
Main Plant - Warehouse Dropoff Entering Full	Grain truck	0.07	0.02	0.00	0.05	0.01	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Main Plant - Warehouse Dropoff Leaving Empty	Grain truck	0.07	0.02	0.00	0.05	0.01	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Bin Site - Unloading Entering Full	Grain truck	0.06	0.02	0.00	0.04	0.01	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Bin Site - Unloading Leaving Empty	Grain truck	0.08	0.02	0.00	0.06	0.02	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Bin Site - Loadout Entering Empty	Grain truck	0.06	0.02	0.00	0.04	0.01	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Bin Site - Loadout Leaving Full	Grain truck	0.08	0.02	0.00	0.06	0.02	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Bagging - Shelled Corn Dropoff Entering Full	Grain truck	0.03	0.01	0.00	0.02	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bagging - Shelled Corn Dropoff Leaving Empty	Grain truck	0.03	0.01	0.00	0.02	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bagging - Treated Corn and Bulk Discard Pickup Entering Empty	Grain truck	0.03	0.01	0.00	0.02	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bagging - Treated Corn and Bulk Discard Pickup Leaving Full	Grain truck	0.03	0.01	0.00	0.02	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Main Plant - Employee Vehicles	Cars	1.42	0.38	0.04	0.94	0.25	0.03	0.19	0.05	0.01	0.19	0.05	0.01
Totals		3.30	0.89	0.09	2.19	0.59	0.06	0.44	0.12	0.01	0.40	0.11	0.01

Methodology

Maximum Weight of Vehicle and Load (ton/trip) = [Maximum Weight of Vehicle (ton/trip)] + [Maximum Weight of Load (ton/trip)]
 Maximum trips per year (trip/yr) = [Maximum Annual Grain Throughput (tons/yr)] / [Maximum Weight of Load (ton/trip)]
 Total Weight driven per year (ton/yr) = [Maximum Weight of Vehicle and Load (ton/trip)] * [Maximum trips per year (trip/yr)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/yr) = [Maximum trips per year (trip/yr)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per year (ton/yr)] / SUM[Maximum trips per year (trip/yr)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/yr)] / SUM[Maximum trips per year (trip/yr)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)
 2007 Actual (tons/yr) = [Controlled PTE (tons/yr)] * [2007 Grain Throughput (tons/yr)] / [Maximum Annual Grain Throughput (tons/yr)]
 For Main Plant - Employee Vehicles, actual emissions are assumed not to scale with production and are equivalent to PTE.

Abbreviations

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

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

Company Name: Select Seed
Address City IN Zip: 277 West State Road 218, Camden, IN 46917
Minor Source Operating Permit No.: M015-33277-00037
Reviewer: Donald McQuigg
Date: June 20, 2013

Paved Roads at Industrial Site

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

Process	Vehicle Type	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per year (trip/yr)	Total Weight driven per year (tons/yr)	one-way distance (feet/trip)	Maximum one-way distance (miles/trip)	one-way miles (miles/yr)
Main Plant - Employee Vehicles	Cars	1.5	0.0	1.5	10,080	15,120	125	0.02	239
Total					10,080	15,120			239

Average Vehicle Weight Per Trip = $\frac{1.5}{0.024}$ tons/trip
 Average Miles Per Trip = $\frac{0.024}{1.5}$ miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
sL =	2.9	2.9	2.9	g/m ² = silt loading value for paved roads at com wet mills - Table 13.2.1-3)
W =	1.5	1.5	1.5	tons = average vehicle weight
C =	0.00047	0.00047	0.00036	lb/mi = factor for exhaust and brake and tire wear (Emission Factor Documentation for AP-42, Chapter 13.2.1, Section 2.2.4)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f \cdot [1 - P/(4N)]$

where P = 123 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	0.04	0.01	0.00	lb/mile
Mitigated Emission Factor, E_{ext} =	0.04	0.01	0.00	lb/mile

Process	Vehicle Type	Unmitigated PTE of PM (ton/yr)	Unmitigated PTE of PM10 (ton/yr)	Unmitigated PTE of PM2.5 (ton/yr)	Mitigated PTE of PM (ton/yr)	Mitigated PTE of PM10 (ton/yr)	Mitigated PTE of PM2.5 (ton/yr)	2007 Actual PM (ton/yr)	2007 Actual PM10 (ton/yr)	2007 Actual PM2.5 (ton/yr)
Main Plant - Employee Vehicles	Cars	5.29E-03	1.10E-03	3.00E-04	4.84E-03	1.01E-03	2.74E-04	4.84E-03	1.01E-03	2.74E-04
Totals		5.29E-03	1.10E-03	3.00E-04	4.84E-03	1.01E-03	2.74E-04	4.84E-03	1.01E-03	2.74E-04

Methodology

Maximum Weight of Vehicle and Load (tons/trip) = [Maximum Weight of Vehicle (tons/trip)] + [Maximum Weight of Load (tons/trip)]
 Maximum trips per year (trip/yr) = [Maximum Annual Grain Throughput (tons/yr)] / [Maximum Weight of Load (tons/trip)]
 Total Weight driven per year (ton/yr) = [Maximum Weight of Vehicle and Load (tons/trip)] * [Maximum trips per year (trip/yr)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/yr) = [Maximum trips per year (trip/yr)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per year (ton/yr)] / SUM[Maximum trips per year (trip/yr)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/yr)] / SUM[Maximum trips per year (trip/yr)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)
 For Main Plant - Employee Vehicles, actual emissions are assumed not to scale with production and are equivalent to PTE.

Abbreviations

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

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: Select Seed
Address City IN Zip: 277 West State Road 218, Camden, IN 46917
Minor Source Operating Permit No.: M015-33277-00037
Reviewer: Donald McQuigg
Date: June 20, 2013

Unit ID	Maximum capacity for each unit of that type ¹	Units	Maximum Process Weight (ton/hr) ^{2,3}	326 IAC 6-3 PM Limit (lb/hr)	Emission Factor (lb/ton)	Max PM PTE (lb/hr)	Control Device Required to Meet Limit?	AP-42 9.9.1-1 Emission Factor Group
Main Plant Receiving - Drive-over Pit	1,000	bu/hr	36	41.57	0.180	6,480	No	Receiving
Husking/Sorting Bed	1,000	bu/hr	36	41.57	0.061	2,196	No	Headhouse & Grain Handling
Silage chopper/loadout	50	bu/hr	2	Not Applicable*	0.086	0.155	No	Shipping & Packaging
Bulk Ear Corn Dryers (Dryer #1 and #2)	150	bu/hr	5	12.69	0.220	1,188	No	Drying
Corn Sheller	800	bu/hr	29	38.96	0.750	21,600	No	Cleaning - Sheller & Cleaner
Sheller Surge Bin	650	bushels	29	38.96	0.025	0.720	No	Storage
Shelled Corn Holding Bins	2,500	bushels	29	38.96	0.025	0.720	No	Storage
Bulk Storage Bins	6,900	bushels	29	38.96	0.025	0.720	No	Storage
Beeswings Storage Bin	2	tons	1	Not Applicable*	0.025	0.036	No	Storage
Bees Wings Loadout	0.04	ton/hr	0.04	Not Applicable*	0.086	0.004	No	Shipping & Packaging
Cob Loadout to Truck w/ Cyclone	4.32	ton/hr	4	Not Applicable*	0.086	0.372	No	Shipping & Packaging
Shelled Corn Loadout to Truck	1,000	bu/hr	26	36.38	0.086	2,236	No	Shipping & Packaging
Rebagging Receiving	100	bags/hr	3	Not Applicable*	0.180	0.450	No	Receiving
Rebagging Storage Bin	50	bushels	3	Not Applicable*	0.025	0.063	No	Storage
Rebagging Bagger	100	bags/hr	3	Not Applicable*	0.086	0.215	No	Shipping & Packaging
Bin Site Receiving & Loadout - Augers	1,200	bu/hr	31	40.30	0.180	5,616	No	Receiving
Bulk Storage Bins	4,000	bushels	31	40.30	0.025	0.780	No	Storage
Treatment/Bagging Receiving - Drive-over Pit	900	bu/hr	23	33.90	0.180	4,212	No	Receiving
Cleaner Storage Bin	850	bushels	23	33.90	0.025	0.585	No	Storage
Grain Cleaner	150	bu/hr	4	10.20	0.750	2,925	No	Cleaning - Sheller & Cleaner
Cleaner Discard Bin	50	bushels	17	Not Applicable*	0.025	0.423	No	Storage
Graders	100	bu/hr	3	Not Applicable*	0.061	0.159	No	Headhouse & Grain Handling
Graders Storage Bins	800	bushels	8	Not Applicable*	0.025	0.195	No	Storage
Gravity Table	300	bu/hr	8	Not Applicable*	0.061	0.476	No	Headhouse & Grain Handling
Gravity Discard Bin	180	bushels	17	Not Applicable*	0.025	0.423	No	Storage
Bulk Discard Loadout Bin	650	bu/hr	17	Not Applicable*	0.025	0.423	No	Storage
Treater Feed Storage Bin	100	bushels	23	33.90	0.025	0.585	No	Storage
Seed Treater	900	bu/hr	23	33.90	0.061	1,427	No	Headhouse & Grain Handling
Treater Storage Bins	150	bushels	23	33.90	0.025	0.585	No	Storage
Aspirator	900	bu/hr	23	33.90	0.075	1,755	No	Cleaning - Aspirator
Bagging Bin	70	bushels	23	33.90	0.025	0.585	No	Storage
Bulk Bagger	360	bu/hr	9	18.35	0.086	0.805	No	Shipping & Packaging
Bagger	360	bu/hr	9	18.35	0.086	0.805	No	Shipping & Packaging

¹ Maximum throughput for each unit obtained during 5/10/12 site visit or provided in 6/28/12 email from client, except for the following: Silage chopper/loadout assumed to have 5% of Husking/Sorting Bed throughput; Cob Loadout to Truck w/ Cyclone assumed to have 15% of Corn Sheller throughput; Bees Wings Loadout assumed to have 1% of Cob Loadout to Truck w/ Cyclone throughput.

² Maximum Process Weight (tons/hour) calculated assuming 72 pounds per bushel for all units handling corn still on the cob; Main Plant Receiving, Husking/Sorting Bed, Silage chopper/loadout, Bulk Ear Corn Dryers, Corn Sheller, and Sheller Surge Bin. All other units handle shelled corn, for which a conversion of 52 pounds per bushel is assumed.

³ Assume sheller surge bin, shelled corn holding bins, and main plant bulk storage bins maximum throughput is equal to corn sheller throughput. Assume beeswings storage bin maximum throughput is equal to 5% of corn sheller throughput. Assume rebagging storage bin maximum throughput is equal to rebagging receiving throughput. Assume storage site bulk storage bins maximum throughput is equal to bin site receiving and loadout throughput. Assume cleaner storage bin maximum throughput is equal to treatment/bagging receiving throughput. Assume cleaner discard bin maximum throughput is equal to bulk discard loadout bin throughput. Assume graders storage bins maximum throughput is equal to gravity table throughput. Assume gravity discard bin maximum throughput is equal to bulk discard loadout bin throughput. Assume treater feed storage bin and treater storage bins maximum throughput are equal to seed treater throughput. Assume bagging bin maximum throughput is equal to aspirator throughput.

*Not Applicable = Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable to each of the units listed in the table, since each unit has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Methodology

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:

$$E = 4.10 P^{0.67}$$

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Larry Jensen
Select Seed
802 Maplewood Ct
Altoona, IA 50009

DATE: September 5, 2013

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

SUBJECT: Final Decision
Minor Source Operating Permit
015-33277-00037

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:
Ron Cree – Plant Manager
David Dempsey – Trinity Consultants
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

September 5, 2013

TO: Camden Jackson Township Public Library

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

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

Applicant Name: Select Seed
Permit Number: 015-33277-00037

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	GHOTOPP 9/5/2013 Select Seed 015-33277-00037 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	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		

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		Larry Jensen Select Seed 802 Maplewood Ct Altoona IA 50009 (Source CAATS) via confirmed delivery										
2		Ron Cree Plant Mgr Select Seed 277 W SR 218 Camden IN 46917 (RO CAATS)										
3		Camden Jackson Twp Public Library 183 West Main Street Camden IN 46917 (Library)										
4		Carroll County Commissioners 101 West Main Street Delphi IN 46923 (Local Official)										
5		Carroll County Health Department 101 W. Main, Courthouse Delphi IN 46923-1566 (Health Department)										
6		Mr. Steve Offitt 6304 West 175 South Kewanna IN 46939 (Affected Party)										
7		Mr. Robert Kelley 2555 S 30th Street Lafayette IN 44909 (Affected Party)										
8		Camden Town Council PO Box 47, 153 W Main Street Camden IN 46917 (Local Official)										
9		Mr. David Dempsey Trinity Consultants 7330 Woodland Drive, Suite 225 Indianapolis IN 46278 (Consultant)										
10												
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8			