



# 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 11, 2013

RE: CF Industries Sales, LLC - Terre Haute Terminal / 167 - 33325 - 00002

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

## Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot 6/13/13



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## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

### CF Industries Sales, LLC - Terre Haute Terminal 9905 U.S. Highway 41 North Rosedale, Indiana 47874

(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.: M167-33325-00002	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 11, 2013 Expiration Date: September 11, 2023

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary ammonia and other nitrogen-based fertilizer storage and distribution terminal.

Source Address:	9905 U.S. Highway 41 North, Rosedale, Indiana 47874
General Source Phone Number:	(812) 466-7311
SIC Code:	5191
County Location:	Vigo
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

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

- (a) One (1) natural gas fired process heater, identified as PH1, constructed in 1988, with a maximum heat input rate of 20.83 MMBtu per hour, exhausting to stack PH1;
- (b) One (1) natural gas fired flare, identified as F1, constructed in 1963, with a maximum heat input rate of 0.15 MMBtu per hour to the flare pilot, exhausting to stack F1;
- (c) Fugitive emissions from paved and unpaved roads [326 IAC 6-4];
- (d) One (1) anhydrous ammonia high pressure storage tank, two (2) anhydrous ammonia low pressure storage tanks, one (1) urea ammonium nitrate solution (UAN) storage tank, and four (4) liquid UAN storage tanks out of service;
- (e) Intermittent painting/sand blasting projects for building maintenance purposes.
- (f) One (1) parts washer with a nine (9) gallon capacity. [326 IAC 8-3-2] [326 IAC 8-3-8]

## **SECTION B GENERAL CONDITIONS**

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

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) 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, M167-33325-00002, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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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**

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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**

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

### **B.6 Property Rights or Exclusive Privilege**

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

### **B.7 Duty to Provide Information**

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

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

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- (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]

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

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

The Permittee shall implement the PMPs.

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

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM,

OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

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

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

- (a) All terms and conditions of permits established prior to M167-33325-00002 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]**

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- (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**

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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]

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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]**

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- (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]**

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- (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]**

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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]

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (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]**

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

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

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

- (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]**

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

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

#### **C.10 Compliance Monitoring [326 IAC 2-1.1-11]**

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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]**

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

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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

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- (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]

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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) 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.

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

One (1) parts washer with a nine (9) gallon capacity. [326 IAC 8-3-2] [326 IAC 8-3-8]

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

Pursuant to 326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements):

- (a) The Permittee shall ensure the following control equipment and operating requirements are met:
  - (1) Equip the degreaser with a cover.
  - (2) Equip the degreaser with a device for draining cleaned parts.
  - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.
  - (6) Store waste solvent only in closed containers.
  - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
  
- (b) The Permittee shall ensure the following additional control equipment and operating requirements are met:
  - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.
    - (E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
  - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

- (3) If used, solvent spray:
  - (A) must be a solid, fluid stream; and
  - (B) shall be applied at a pressure that does not cause excessive splashing.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

- (a) Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure than exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Pursuant to 326 IAC 8-3-8(c)(2), on and after January 1, 2015, the following records shall be maintained for each purchase of cold cleaner degreaser solvent:
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
  - (3) The type of solvent purchased.
  - (4) The total volume of the solvent purchased.
  - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (c) All records required by 326 IAC 8-3-8(c)(2) shall be:
  - (1) retained on-site or accessible electronically from the site for the most recent three (3) year period; and
  - (2) reasonably accessible for an additional two (2) year period.

**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).

<b>Company Name:</b>	CF Industries Sales, LLC - Terre Haute Terminal
<b>Address:</b>	9905 U.S. Highway 41 North
<b>City:</b>	Rosedale, Indiana 47874
<b>Phone #:</b>	(812) 466-7311
<b>MSOP #:</b>	M167-33325-00002

I hereby certify that CF Industries Sales, LLC -  
Terre Haute Terminal is :

I hereby certify that CF Industries Sales, LLC -  
Terre Haute Terminal is :

- still in operation.
- no longer in operation.
- in compliance with the requirements  
MSOP M167-33325-00002.
- not in compliance with the  
requirements of MSOP  
M167-33325-00002.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**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:

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**Attachment A  
to Minor Source Operating Permit Renewal No. M167-33325-00002**

**Fugitive Dust Control Plan**

**CF Industries Sales, LLC - Terre Haute Terminal  
9905 U.S. Highway 41 North  
Rosedale, Indiana 47874**

Attachment A  
 Fugitive Dust Control Plan

326 IAC 6-5-5 Section 5 (a)	
1. Name and Address of the Source:	CF Industries Sales, LLC - Terre Haute Terminal 9905 US Highway 41 North Rosedale, IN 47874
2. Name and Address of the owner or operator responsible for execution of the plan:	CF Industries Sales, LLC. 4 Parkway North Suite 400 Deerfield, IL 60015
3. Identification of all processes, operations and areas which have the potential to emit fugitive particulate matter in accordance with 326 IAC 6-5-4:	Paved roads from property boundary (US Highway 41) to ammonia loading racks, UAN loading racks, and office. Unpaved roads from property boundary (US Highway 41) to ammonia truck loading area.
4. A map of the source showing aggregate pile areas, access areas around the aggregate pile, unpaved roads, paved roads, parking lots, and location of conveyor transfer points, etc.	Attached is a site plan with the paved and unpaved roads identified.
5. The number and mix of vehicular activity occurring on paved roads, unpaved roads, and parking lots.	See Permit Application – Appendix A: Fugitive Dust Emissions – Unpaved Roads. See Permit Application – Appendix A: Fugitive Dust Emissions –Paved Roads.
6. Type and quantity of material handled.	Anhydrous ammonia and UAN solution. Quantities are variable.
7. Equipment used to maintain aggregate piles.	Not applicable
8. A description of the measures to be implemented to control fugitive particulate matter emissions resulting from emission points identified in subdivision (3).	(E) Equivalent alternate measures: Vehicle restrictions have been implemented at the site. The enforced speed limit is 15 miles per hour.
9. A description of the dust suppressant material such as oil or chemical including the estimated frequency of application rates and concentrations.	Not applicable. Historical experience at the terminal has demonstrated that fugitive dust emissions are effectively controlled with the existing vehicle restrictions (speed limits). Fugitive dust has not been observed crossing property lines. Also, there have been no neighbor complaints regarding fugitive dust.
10. A specification of the particulate matter collection equipment used as a fugitive particulate matter emission control measure.	Not applicable
11. A schedule of compliance with the provisions of the control plan. Such schedule shall specify the amount of time the source requires to award any necessary contracts, commence and complete construction, installation, or modification of the fugitive particulate matter control measures.	Vehicle Restrictions: The speed limit is currently in place and enforced through training of the drivers. Drivers violating this speed limit are stopped and informed they are speeding. If a driver continues to violate the speed limit, access to the site is denied.
12. Other relevant data that may be requested by the commissioner, to evaluate the effectiveness of the control plan.	To be determined

Records shall be kept and maintained that document the control measures under this plan. The records shall be available upon the request of the commissioner and shall be retained for three years.

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

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

<b>Source Background and Description</b>
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<b>Source Name:</b>	CF Industries Sales, LLC - Terre Haute Terminal
<b>Source Location:</b>	9905 U.S. Highway 41 North, Rosedale, Indiana 47874
<b>County:</b>	Vigo
<b>SIC Code:</b>	5191
<b>Permit Renewal No.:</b>	M167-33325-00002
<b>Permit Reviewer:</b>	Donald McQuigg

On August 9, 2013, the Office of Air Quality (OAQ) had a notice published in the Tribune Star, Terre Haute, Indiana, stating that CF Industries Sales, LLC - Terre Haute Terminal had applied for a Minor Source Operating Permit (MSOP) Renewal to continue operating a stationary fertilizer storage and distribution terminal. The notice also stated that the OAQ proposed to issue a Minor Source Operating Permit Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The IDEM does not amend the Technical Support Document (TSD). The TSD is maintained to document the original review. This addendum to the TSD is used to document comments, responses to comments and changes made from the time the permit was drafted until a final decision is made. Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added. If necessary, the Table of Contents will be modified to reflect these changes.

<b>Comments and Responses</b>
-------------------------------

Comments on the proposed Minor Source Operating Permit Renewal were received on September 4, 2013 from Mr. Sean Beinecke representing CF Industries Sales, LLC - Terre Haute Terminal.

Comment #1

Section A.2(d) incorrectly states that one (1) anhydrous ammonia low pressure storage tank is located onsite instead of two (2) tanks.

Section A.2(d) should read "One (1) anhydrous ammonia high pressure storage tank, **two (2)** low pressure storage tanks, one (1) urea ammonium nitrate solution (UAN) storage tank, and four (4) liquid UAN storage tanks out of service."

Response to Comment #1

The following changes have been made to Section A.2, Emission Units and Pollution Control Equipment Summary:

A.2 Emission Units and Pollution Control Equipment Summary

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

\*\*\*\*

- (d) One (1) anhydrous ammonia high pressure storage tank, ~~one~~ **two (2)** anhydrous ammonia low pressure storage tanks, one (1) urea ammonium nitrate solution (UAN) storage tank, and four (4) liquid UAN storage tanks out of service;

\*\*\*\*

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed Part 70 Operating 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 permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

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

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

**Source Background and Description**

<b>Source Name:</b>	CF Industries Sales, LLC - Terre Haute Terminal
<b>Source Location:</b>	9905 U.S. Highway 41 North, Rosedale, IN 47874
<b>County:</b>	Vigo
<b>SIC Code:</b>	5191
<b>Permit Renewal No.:</b>	M167-33325-00002
<b>Permit Reviewer:</b>	Donald McQuigg

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from CF Industries Sales, LLC - Terre Haute Terminal relating to the operation of a stationary ammonia and other nitrogen-based fertilizer storage and distribution terminal. On June 20, 2013, CF Industries Sales, LLC - Terre Haute Terminal submitted an application to the OAQ requesting to renew its operating permit. CF Industries Sales, LLC - Terre Haute Terminal was issued MSOP No. M167-26553-00002 on October 28, 2008.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

- (a) One (1) natural gas fired process heater, identified as PH1, constructed in 1988, with a maximum heat input rate of 20.83 MMBtu per hour, exhausting to stack PH1;
- (b) One (1) natural gas fired flare, identified as F1, constructed in 1963, with a maximum heat input rate of 0.15 MMBtu per hour to the flare pilot, exhausting to stack F1;
- (c) Fugitive emissions from paved and unpaved roads [326 IAC 6-4];
- (d) One (1) anhydrous ammonia high pressure storage tank, one (1) anhydrous ammonia low pressure storage tank, one (1) urea ammonium nitrate solution (UAN) storage tank, and four (4) liquid UAN storage tanks out of service;
- (e)\* Intermittent painting/sand blasting projects for building maintenance purposes.
- (f)\* One (1) parts washer with a nine (9) gallon capacity. [326 IAC 8-3-2] [326 IAC 8-3-8]

\*Note: these exempt emission units were added during the renewal process and did not require construction approval pursuant to 326 IAC 2-6.1-6(d)(11).

**Existing Approvals**

Since the issuance of MSOP No. M167-26553-00002 on October 28, 2008, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 167-32687-00002 issued on January 18, 2013.

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

### Enforcement Issue

There are no enforcement actions pending.

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### County Attainment Status

The source is located in Vigo County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective February 6, 2006, for the Terre Haute area, including Vigo County, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.  
Unclassifiable or attainment effective April 5, 2005, for PM<sub>2.5</sub>.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Vigo County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**  
Vigo 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.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	37.37
PM <sub>10</sub> <sup>(1)</sup>	9.86
PM <sub>2.5</sub> <sup>(1)</sup>	1.76
SO <sub>2</sub>	0.05
VOC	0.62
CO	7.56
NO <sub>x</sub>	9.33
GHG as CO <sub>2</sub> e	10,861
NH <sub>3</sub> <sup>(2)</sup>	0.36
Single HAP	0.16 (hexane)
Total HAP	0.17

(1) Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are considered as "regulated air pollutants".

(2) The anhydrous ammonia handled at this plant is a regulated pollutant under Section 112(r)(3) of the Clean Air Act.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants, excluding GHGs, is less than one hundred (100) tons per year. PM is equal to or greater than twenty-five (25) tons per year. Therefore, this source does not qualify for a Registration and is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHG is less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) emissions per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

**Federal Rule Applicability**

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, (40 CFR 60, Subpart Kb), are not included in this permit for the urea ammonium nitrate solution storage tank because the storage vessel has a capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa).

- (b) There are no New Source Performance Standards (NSPS) (40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Equipment Leaks, 40 CFR 63.160, Subpart H, are not included in the permit for the ammonia storage tank, urea ammonium nitrate solution storage tank, and distribution facility pumps, connectors, sampling system, and control devices. The ammonia storage tank, urea ammonium nitrate solution storage tank, and distribution facility does not operate in hazardous air pollutant service. Therefore, 40 CFR 63.160, Subpart H does not apply.
- (d) 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.

Compliance Assurance Monitoring (CAM)

- (e) 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.

<b>State Rule Applicability - Entire Source</b>
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326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

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 pollutants are less than 250 tons 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.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit 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 2-4.1.

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 five (5) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

**326 IAC 6-4 (Fugitive Dust Emissions Limitations)**

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

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

The source is subject to the requirements of 326 IAC 6-5, because the paved and unpaved roads have potential fugitive particulate emissions greater than twenty-five (25) tons per year. Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, submitted on August 15, 2008, which is included as Attachment A to the permit.

**326 IAC 6.5 (Fugitive Particulate Matter Limitations Except Lake County)**

Pursuant to 326 IAC 6.5-1-1(2), the source is not subject to the requirements of 326 IAC 6.5, because the potential particulate emissions are less than one hundred (100) tons per year and actual particulate emissions are less than ten (10) tons per year.

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

The unlimited potential VOC emissions from all emission units at this source are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

<b>State Rule Applicability – Parts Washer/Degreaser</b>
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**326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements)**

Pursuant to 326 IAC 8-3-2:

- (a) The Permittee shall ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover.
  - (2) Equip the degreaser with a device for draining cleaned parts.
  - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.
  - (6) Store waste solvent only in closed containers.
  - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) The Permittee shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.

- (D) Carbon adsorption.
  - (E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
  - (3) If used, solvent spray:
    - (A) must be a solid, fluid stream; and
    - (B) shall be applied at a pressure that does not cause excessive splashing.

326 IAC 8-3-8 (Material requirements for cold cleaner degreasers)

- (a) Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure than exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Pursuant to 326 IAC 8-3-8(c)(2), on and after January 1, 2015, the following records shall be maintained for each purchase of cold cleaner degreaser solvent:
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
  - (3) The type of solvent purchased.
  - (4) The total volume of the solvent purchased.
  - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (c) All records required by 326 IAC 8-3-8(c)(2) shall be:
  - (1) retained on-site or accessible electronically from the site for the most recent three (3) year period; and
  - (2) reasonably accessible for an additional two (2) year period.

<b>Recommendation</b>
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The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 20, 2013.

### Conclusion

The operation of this stationary ammonia and other nitrogen-based fertilizer storage and distribution terminal shall be subject to the conditions of the attached MSOP Renewal No. M167-33325-00002.

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

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

**Company Name:** CF Industries Sales, LLC - Terre Haute Terminal  
**Address City IN Zip:** 9905 US Highway 41 North, Rosedale, Indiana 47874  
**Minor Source Operating Permit Renewal No.:** M167-33325-00002  
**Reviewer:** Donald McQuigg  
**Date:** July 1, 2013

Process description	Unlimited/Uncontrolled Potential to Emit (tons/year)*									
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHG as CO <sub>2</sub> e	Total HAPs	Worst Single HAP
<b>Non-Fugitive Emissions</b>										
Process heater	0.17	0.68	0.68	0.05	8.93	0.49	7.50	10,783	0.17	0.161 (hexane)
Process flare	0.001	0.005	0.005	0.000	0.064	0.004	0.054	78	-	-
Pffbt	-	-	-	-	0.33	-	-	-	-	-
one (1) UAN storage tank	-	-	-	-	-	0.05	-	-	-	-
Degreaser	-	-	-	-	-	0.12	-	-	-	-
<b>Total Non-Fugitive Emissions</b>	<b>0.17</b>	<b>0.68</b>	<b>0.68</b>	<b>0.05</b>	<b>9.33</b>	<b>0.66</b>	<b>7.56</b>	<b>10,861</b>	<b>0.17</b>	<b>0.16 (hexane)</b>
<b>Fugitive Emissions</b>										
Unpaved Roads	31.730	8.087	0.809	-	-	-	-	-	-	-
Paved Roads	5.470	1.094	0.269	-	-	-	-	-	-	-
<b>Total Fugitive Emissions</b>	<b>37.20</b>	<b>9.18</b>	<b>1.08</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
<b>Total Non-Fugitive and Fugitive Emissions</b>	<b>37.37</b>	<b>9.86</b>	<b>1.76</b>	<b>0.05</b>	<b>9.33</b>	<b>0.66</b>	<b>7.56</b>	<b>10,861</b>	<b>0.17</b>	<b>0.16 (hexane)</b>

**Notes**

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Process Heater**

**Company Name:** CF Industries Sales, LLC - Terre Haute Terminal  
**Address City IN Zip:** 9905 US Highway 41 North, Rosedale, Indiana 47874  
**Minor Source Operating Permit Renewal No.:** M167-33325-00002  
**Reviewer:** Donald McQuigg  
**Date:** July 1, 2013

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
20.8	1020	178.6

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.2	0.7	0.7	0.1	8.9	0.5	7.5

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

**Methodology**

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

**HAPS Calculations**

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.876E-04	1.072E-04	6.699E-03	1.608E-01	3.037E-04	<b>1.681E-01</b>

  

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals	
	Lead	Cadmium	Chromium	Manganese	Nickel		
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03		
Potential Emission in tons/yr	4.466E-05	9.825E-05	1.250E-04	3.394E-05	1.876E-04	<b>4.895E-04</b>	
						<b>Total HAPs</b>	<b>1.686E-01</b>
						<b>Worst HAP</b>	<b>1.608E-01</b>

Methodology is the same as above.

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

**Greenhouse Gas Calculations**

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	10,718	0.2	0.2
Summed Potential Emissions in tons/yr	10,719		
CO2e Total in tons/yr	10,783		

**Methodology**

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Process Flare**

**Company Name:** CF Industries Sales, LLC - Terre Haute Terminal  
**Address City IN Zip:** 9905 US Highway 41 North, Rosedale, Indiana 47874  
**Minor Source Operating Permit Renewal No.:** M167-33325-00002  
**Reviewer:** Donald McQuigg  
**Date:** July 1, 2013

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
0.15	1020	1.3

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.001	0.005	0.005	0.000	0.064	0.004	0.054

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

**Methodology**

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

**HAPS Calculations**

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	
Potential Emission in tons/yr	1.353E-06	7.729E-07	4.831E-05	1.159E-03	2.190E-06	<b>1.212E-03</b>

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission in tons/yr	3.221E-07	7.085E-07	9.018E-07	2.448E-07	1.353E-06	<b>3.530E-06</b>
					<b>Total HAPs</b>	<b>1.216E-03</b>
					<b>Worst HAP</b>	<b>2.100E-03</b>

Methodology is the same as above

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

**Greenhouse Gas Calculations**

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	77	0.0	0.0
Summed Potential Emissions in tons/yr	77		
CO2e Total in tons/yr	78		

**Methodology**

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

**Appendix A: Emission Calculations**  
**Process Flare Fuel-Bound and Thermal NOx**

**Company Name:** CF Industries Sales, LLC - Terre Haute Terminal  
**Address City IN Zip:** 9905 US Highway 41 North, Rosedale, Indiana 47874  
**Minor Source Operating Permit Renewal No.:** M167-33325-00002  
**Reviewer:** Donald McQuigg  
**Date:** July 1, 2013

Ammonia Vapor Flaring Rate:	40,000 lbs/day
*Fuel-bound NOx Rate:	0.50 % ammonia vapor
*Thermal Nox Rate:	0.06 lbs NOx/MMBtu
Ammonia Heating Value	8037 Btu/lb ammonia vapor

Fuel-bound NOx Emissions:  
48,000 lbs/day x 0.5 % ammonia vapor x 3 days/yr\*\* x 1 ton/2000lbs = 0.3 tons/yr

Thermal NOx Emissions:  
48,000 lbs/day x 8037 Btu/lb x 1MMBtu/10<sup>6</sup> Btu x 0.06 lbs NOx/MMBtu  
x 3 days/yr\*\* x 1ton/2000 lbs = 0.03 tons/yr

Fuel-bound Nox Emissions + Thermal Nox Emissions: 0.33 tons/yr

\*Values were provided by the flare vendor and are consistent with values found in "Air Permit Technical Guidance for Chemical Sources: Flares and Oxidizers" from the Texas Natural Resources Conservation Commission (October 2000, RG-109 draft).

\*\*Historical data indicates the flare would only combust 3 days out of the year.

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

**Company Name:** CF Industries Sales, LLC - Terre Haute Terminal  
**Address City IN Zip:** 9905 US Highway 41 North, Rosedale, Indiana 47874  
**Minor Source Operating Permit Renewal No.:** M167-33325-00002  
**Reviewer:** Donald McQuigg  
**Date:** July 1, 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).

**Vehicle Information (provided by source)**

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Ammonia Truck (unloaded, entering plant) (one-way trip)			120.0	19.5	2340.0	528	0.100	12.0	4380.0
Ammonia Truck (loaded, leaving plant) (one-way trip)			120.0	40.0	4800.0	528	0.100	12.0	4380.0
JAN Trucks (unloaded, entering plant) (one-way trip)			0.0	15.0	0.0	0	0.000	0.0	0.0
JAN Trucks (loaded, leaving plant) (one-way trip)			0.0	40.0	0.0	0	0.000	0.0	0.0
Employee Vehicles (one-way trip) - in			0.0	2.0	0.0	0	0.000	0.0	0.0
Employee Vehicles (one-way trip) - out			0.0	2.0	0.0	0	0.000	0.0	0.0
Contractor/Visitor Vehicles (one-way trip) - in			0.0	2.0	0.0	0	0.000	0.0	0.0
Contractor/Visitor Vehicles (one-way trip) - out			0.0	2.0	0.0	0	0.000	0.0	0.0
<b>Totals</b>			<b>240.0</b>	<b>140.0</b>	<b>7140.0</b>			<b>24.0</b>	<b>8760.0</b>

Average Vehicle Weight Per Trip = 29.8 tons/trip  
 Average Miles Per Trip = 0.10 miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	29.8	29.8	29.8	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [(365 - P)/365]$  (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor,  $E_{ext} = E * [(365 - P)/365]$   
 where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	7.24	1.85	0.18	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	4.76	1.21	0.12	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Ammonia Truck (unloaded, entering plant) (one-way trip)	15.87	4.04	0.40	10.43	2.66	0.27	5.22	1.33	0.13
Ammonia Truck (loaded, leaving plant) (one-way trip)	15.87	4.04	0.40	10.43	2.66	0.27	5.22	1.33	0.13
JAN Trucks (unloaded, entering plant) (one-way trip)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
JAN Trucks (loaded, leaving plant) (one-way trip)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Employee Vehicles (one-way trip) - in	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Employee Vehicles (one-way trip) - out	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Contractor/Visitor Vehicles (one-way trip) - in	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Contractor/Visitor Vehicles (one-way trip) - out	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Totals</b>	<b>31.73</b>	<b>8.09</b>	<b>0.81</b>	<b>20.86</b>	<b>5.32</b>	<b>0.53</b>	<b>10.43</b>	<b>2.66</b>	<b>0.27</b>

**Methodology**

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

**Abbreviations**

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

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

**Company Name:** CF Industries Sales, LLC - Terre Haute Terminal  
**Address City IN Zip:** 9905 US Highway 41 North, Rosedale, Indiana 47874  
**Minor Source Operating Permit Renewal No.:** M167-33325-00002  
**Reviewer:** Donald McQuigg  
**Date:** July 1, 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).

Vehicle Information

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Ammonia Trucks (unloaded, entering plant) (one-way trip)			120.0	19.5	2340.0	1584	0.300	36.0	13140.0
Ammonia Trucks (loaded, leaving plant) (one-way trip)			120.0	40.0	4800.0	2112	0.400	48.0	17520.0
UAN Trucks (unloaded, entering plant) (one-way trip)			60.0	15.0	900.0	2112	0.400	24.0	8760.0
UAN Trucks (loaded, leaving plant) (one-way trip)			60.0	40.0	2400.0	2640	0.500	30.0	10950.0
Employee Vehicles (one-way trip) - in			10.0	2.0	20.0	2112	0.400	4.0	1460.0
Employee Vehicles (one-way trip) - out			10.0	2.0	20.0	2112	0.400	4.0	1460.0
Contractor/Visitor Vehicles (one-way trip) - in			20.0	2.0	40.0	2112	0.400	8.0	2920.0
Contractor/Visitor Vehicles (one-way trip) - out			20.0	2.0	40.0	2112	0.400	8.0	2920.0
<b>Total</b>			<b>420.0</b>		<b>10560.0</b>			<b>162.0</b>	<b>59130.0</b>

Average Vehicle Weight Per Trip =  $\frac{25.1}{0.39}$  tons/trip  
 Average Miles Per Trip =  $\frac{25.1}{0.39}$  miles/trip

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

where k =	PM	PM10	PM2.5	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	0.011	0.0022	0.00054	tons = average vehicle weight (provided by source)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = Ubitiguous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

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

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

where p =  $\frac{125}{365}$  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
 N = 365 days per year

Unmitigated Emission Factor, $E_f =$	PM	PM10	PM2.5	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.185	0.037	0.009	lb/mile
Dust Control Efficiency =	0.169	0.034	0.008	0%

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Ammonia Trucks (unloaded, entering plant) (one-way trip)	1.215	0.243	0.060	1.111	0.222	0.055	1.111	0.222	0.055
Ammonia Trucks (loaded, leaving plant) (one-way trip)	1.621	0.324	0.080	1.482	0.296	0.073	1.482	0.296	0.073
UAN Trucks (unloaded, entering plant) (one-way trip)	0.810	0.162	0.040	0.741	0.148	0.036	0.741	0.148	0.036
UAN Trucks (loaded, leaving plant) (one-way trip)	1.013	0.203	0.050	0.926	0.185	0.045	0.926	0.185	0.045
Employee Vehicles (one-way trip) - in	0.135	0.027	0.007	0.123	0.025	0.006	0.123	0.025	0.006
Employee Vehicles (one-way trip) - out	0.135	0.027	0.007	0.123	0.025	0.006	0.123	0.025	0.006
Contractor/Visitor Vehicles (one-way trip) - in	0.270	0.054	0.013	0.247	0.049	0.012	0.247	0.049	0.012
Contractor/Visitor Vehicles (one-way trip) - out	0.270	0.054	0.013	0.247	0.049	0.012	0.247	0.049	0.012
<b>Total</b>	<b>5.47</b>	<b>1.094</b>	<b>0.269</b>	<b>5.001</b>	<b>1.000</b>	<b>0.246</b>	<b>5.001</b>	<b>1.000</b>	<b>0.246</b>

**Methodology**

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

**Abbreviations**

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

**Appendix A: Emission Calculations**  
**Degreaser VOC Emissions**

**Company Name:** CF Industries Sales, LLC - Terre Haute Terminal

**Address City IN Zip:** 9905 US Highway 41 North, Rosedale, Indiana 47874

**Minor Source Operating Permit Renewal No.:** M167-33325-00002

**Reviewer:** Donald McQuigg

**Date:** July 1, 2013

<b>Solvent</b>	<b>Density (lb/gal)</b>	<b>Unit Capacity (gal)</b>	<b>Service Cycle (fills/yr)</b>	<b>VOC PTE (ton/yr)</b>
Stoddard 105	6.7	9	4	0.12

**Appendix A: Emission Calculations**  
**UAN Storage Tank\* VOC Emissions**

**Company Name:** CF Industries Sales, LLC - Terre Haute Terminal  
**Address City IN Zip:** 9905 US Highway 41 North, Rosedale, Indiana 47874  
**Minor Source Operating Permit Renewal No.:** M167-33325-00002  
**Reviewer:** Donald McQuigg  
**Date:** July 1, 2013

<b>Material**</b>	<b>VOC Content (%)</b>	<b>Breathing Loss (ton/yr)</b>	<b>Working Loss (ton/yr)</b>	<b>VOC PTE (ton/yr)</b>
Urea ammonium nitrate solution	32%	0.009	0.036	0.045

\* One (1) 7923 m<sup>3</sup> verticle tank, fixed dome type. Four (4) additional UAN storage tanks are out of service and not used.

\*\* A surrogate with similar vapor pressure (alpha methyl styrene) was used in U.S. EPA Tanks calculation.

**Methodology**

The VOC potential passive emissions for the tanks were calculated using the U.S. EPA TANKS 4.0.9d program.



# 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:** Christopher Angel  
CF Industries Sales, LLC - Terre Haute Terminal  
9905 US Hwy 41 N  
Rosedale, IN 47874

**DATE:** September 11, 2013

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

**SUBJECT:** Final Decision  
MSOP - Renewal  
167 - 33325 - 00002

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:  
John Foster, Mgr  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto: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 11, 2013

TO: Vigo Co Public Library 1 Library Square Terre Haute IN

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

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

**Applicant Name: CF Industries Sales, LLC - Terre Haute Terminal**  
**Permit Number: 167 - 33325 - 00002**

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	LPOGOST 9/11/2013 CF Industries Sales, LLC - Terre Haute Terminal 167 - 33325 - 00002 /final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Christopher Angel CF Industries Sales, LLC - Terre Haute Terminal 9905 US Hwy 41 N Rosedale IN 47874 (Source CAATS) Via confirmed delivery										
2		John Foster Mgr CF Industries Sales, LLC - Terre Haute Terminal 4 Pkwy N, Ste 400 Deerfield IL 60015 (RO CAATS)										
3		Vigo County Board of Commissioners County Annex, 121 Oak Street Terre Haute IN 47807 (Local Official)										
4		Vigo County Health Department 147 Oak Street Terre Haute IN 47807 (Health Department)										
5		Vigo Co Public Library 1 Library Square Terre Haute IN 47807-3609 (Library)										
6		J.P. Roehm PO Box 303 Clinton IN 47842 (Affected Party)										
7												
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