



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: August 1, 2013

RE: ADM Grain Company/073-33343-00021

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Dustin Lindahl, Superintendent
ADM Grain Company
9179 W State Road 14
Rensselaer, IN 47978

August 1, 2013

Re: 073-33343-00021
First Administrative Amendment to
M073-31260-00021

Dear Mr. Lindahl:

ADM Grain Company was issued a Minor Source Operating Permit (MSOP) Renewal No. M073-31260-00021 on June 27, 2012 for a stationary grain elevator located at 9179 W State Road 14, Rensselaer, IN 47978. On June 24, 2013, the Office of Air Quality (OAQ) received an application from the source requesting changes to the internal handling operation at the facility, including the replacement of an auger with a conveyor, and the extension of an existing conveyor.

Pursuant to 326 IAC 2-6.1-6(d)(2)(A), this change to the permit is considered an administrative amendment because the permit is amended to change the descriptive information where the revision will not trigger a new application requirement.

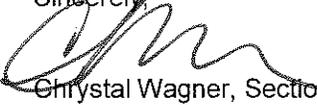
The uncontrolled/unlimited potential to emit of the entire source after the changes to the internal handling operation will continue to be within the threshold levels specified in 326 IAC 2-6.1 (MSOP). The potential to emit calculation has been updated based on AP-42 guidance. See Appendix A for the revised limited PTE of the source after the changes.

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik of my staff at 317-233-0868 or 1-800-451-6027, and ask for extension 3-0868.

Sincerely,



Chrystal Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit and Appendix A

CW/MDM

cc: File - Jasper County
Jasper County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch





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Michael R. Pence
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**Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY**

**ADM Grain Co
9179 W State Road 14
Rensselaer, Indiana 47978**

(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.: M073-31260-00021	
Issued by: Original Signed By Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 27, 2012 Expiration Date: June 27, 2022

Administrative Amendment No.: M073-33343-00021	
Issued by:  Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 1, 2013 Expiration Date: June 27, 2022

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[IC 13-14-1-13]

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Attachment A: New Source Performance Standards (NSPS) 40 CFR 60, Subpart DD

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary grain elevator with a permanent storage capacity greater than 2.5 million U.S. bushels.

Source Address:	9179 W State Road 14, Rensselaer, Indiana 47978
General Source Phone Number:	(217) 424-5200
SIC Code:	5153 (Grain and Field Beans)
County Location:	Jasper
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Five (5) truck receiving facilities, identified as EP-1, with a combined maximum capacity of 58,500 bushels/hr:
- Note: 1 bushel = 60 pounds
- (i) Truck Receiving - House Pit, with a maximum capacity of 10,000 bushels/hr, installed in 1974.
 - (ii) Truck Receiving - Penalty Box Pit, with a maximum capacity of 3,500 bushels/hr, installed in 1974.
 - (iii) Truck Receiving - North Pit, with a maximum of 15,000 bushels/hr, installed in 1993, approved in 2012 for installation of baffles for particulate control.
 - (iv) Truck Receiving - Middle Pit, with a maximum of 15,000 bushels/hr, installed in 1993, approved in 2012 for installation of baffles for particulate control.
 - (v) Truck Receiving - South Pit, with a maximum of 15,000 bushels/hr, installed in 1993, approved in 2012 for installation of baffles for particulate control.
- (b) One (1) internal handling operation, identified as EP-2, with a maximum capacity of 600,000 tons/yr (20,000,000 bushels/yr), constructed between 1962 and 2006, modified in 2013, consisting of conveyors, legs, drags, loadouts, belts, distributors and augers.
- (c) Two (2) grain cleaners, identified as EP-3, with a combined maximum capacity of 22,000 bushels/hr :

- (i) House Cleaner, with a maximum capacity of 10,000 bushels/hr and installed in 1993.
- (ii) GSI Cleaner, with a maximum capacity of 12,000 bushels/hr and installed in 1996.
- (d) Two (2) propane grain dryers, both identified as EP-4, with a combined maximum heat capacity of 77,861,000 Btu per hour and a combined maximum capacity of 6,800 bushels/hr:
 - (i) Zimmerman VT5046 Dryer, with a maximum heat capacity of 60,192,000 Btu per hour and a maximum capacity of 5,000 bushels/hr, installed in 1993.
 - (ii) Zimmerman VT1816 Dryer, with a maximum heat capacity of 17,669,000 Btu per hour and a maximum capacity of 1,500 bushels/hr, installed in 1988.
- (e) Twelve (12) truck/rail shipping units, identified as EP-5, with a combined maximum capacity of 160,000 bushels/hr:
 - (i) Truck Loadout Bin 5, with a maximum capacity of 15,000 bushels/hr and installed in 2004.
 - (ii) Truck Loadout Bin 6, with a maximum capacity of 15,000 bushels/hr and installed in 2004.
 - (iii) Truck Loadout Bin 19, with a maximum capacity of 10,000 bushels/hr and installed in 1979.
 - (iv) Truck Loadout Bin 20, with a maximum capacity of 10,000 bushels/hr and installed in 1979.
 - (v) Rail Loadout, with a maximum capacity of 40,000 bushels/hr and installed in 1993.
 - (vi) Side Draw Loadout Bin 13, with a maximum capacity of 10,000 bushels/hr and installed in 1974.
 - (vii) Two (2) Side Draw Loadout Bin 15, with a maximum capacity of 20,000 bushels/hr and installed in 1978.
 - (viii) Two (2) Side Draw Loadout Bin 17, with a maximum capacity of 20,000 bushels/hr and installed in 1980.
 - (ix) Side Draw Loadout Bin 21, with a maximum capacity of 10,000 bushels/hr and installed in 1993.
 - (x) Side Draw Loadout Bin 25, with a maximum capacity of 10,000 bushels/hr and installed in 1999.
- (f) Paved and unpaved roads, identified as EP-6.
- (g) Two (2) temporary ground piles, identified as EP-7, with a combined maximum capacity of 1,400,000 bushels.
- (h) One (1) temporary ground pile with a maximum capacity of 1,000,000 bushels per year, approved for operation in 2010.

- (i) Twenty-five (25) storage bin vents, identified as EP-8, with a combined maximum capacity 4,285,685 bushels.
- (i) Seven (7) concrete silos with a combined maximum capacity of 314,970 bushels.
- (ii) Seventeen (17) steel bins with a combined maximum capacity of 3,871,662 bushels.
- (iii) One (1) flat building with a maximum capacity of 99,053 bushels.

Note: In 1999, the permanent storage capacity for this grain elevator increased to greater than the 2.5 million U.S. bushels applicability threshold for the New Source Performance Standard (NSPS) Standards of Performance for Grain Elevators (40 CFR 60, Subpart DD).

Under the New Source Performance Standard (NSPS) Standards of Performance for Grain Elevators (40 CFR 60, Subpart DD) each truck unloading station, truck loading station, railcar loading station, railcar unloading station, and grain dryer, and all grain handling operations that were constructed, modified, or reconstructed in 1999 or later are considered affected facilities.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M073-31260-00021, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M073-31260-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

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

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

C.14 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Five (5) truck receiving facilities, identified as EP-1, with a combined maximum capacity of 58,500 bushels/hr:

Note: 1 bushel = 60 pounds

- (i) Truck Receiving - House Pit, with a maximum capacity of 10,000 bushels/hr, installed in 1974.
 - (ii) Truck Receiving - Penalty Box Pit, with a maximum capacity of 3,500 bushels/hr, installed in 1974.
 - (iii) Truck Receiving - North Pit, with a maximum of 15,000 bushels/hr, installed in 1993, approved in 2012 for installation of baffles for particulate control.
 - (iv) Truck Receiving - Middle Pit, with a maximum of 15,000 bushels/hr, installed in 1993, approved in 2012 for installation of baffles for particulate control.
 - (v) Truck Receiving - South Pit, with a maximum of 15,000 bushels/hr, installed in 1993, approved in 2012 for installation of baffles for particulate control.
- (b) One (1) internal handling operation, identified as EP-2, with a maximum capacity of 600,000 tons/yr (20,000,000 bushels/yr), constructed between 1962 and 2006, modified in 2013, consisting of conveyors, legs, drags, loadouts, belts, distributors and augers.
- (c) Two (2) grain cleaners, identified as EP-3, with a combined maximum capacity of 22,000 bushels/hr :
- (i) House Cleaner, with a maximum capacity of 10,000 bushels/hr and installed in 1993.
 - (ii) GSI Cleaner, with a maximum capacity of 12,000 bushels/hr and installed in 1996.
- (d) Two (2) propane grain dryers, both identified as EP-4, with a combined maximum heat capacity of 77,861,000 Btu per hour and a combined maximum capacity of 6,800 bushels/hr:
- (i) Zimmerman VT5046 Dryer, with a maximum heat capacity of 60,192,000 Btu per hour and a maximum capacity of 5,000 bushels/hr, installed in 1993.
 - (ii) Zimmerman VT1816 Dryer, with a maximum heat capacity of 17,669,000 Btu per hour and a maximum capacity of 1,500 bushels/hr, installed in 1988.
- (e) Twelve (12) truck/rail shipping units, identified as EP-5, with a combined maximum capacity of 160,000 bushels/hr:
- (i) Truck Loadout Bin 5, with a maximum capacity of 15,000 bushels/hr and installed in 2004.
 - (ii) Truck Loadout Bin 6, with a maximum capacity of 15,000 bushels/hr and installed in 2004.
 - (iii) Truck Loadout Bin 19, with a maximum capacity of 10,000 bushels/hr and installed in 1979.

- (iv) Truck Loadout Bin 20, with a maximum capacity of 10,000 bushels/hr and installed in 1979.
 - (v) Rail Loadout, with a maximum capacity of 40,000 bushels/hr and installed in 1993.
 - (vi) Side Draw Loadout Bin 13, with a maximum capacity of 10,000 bushels/hr and installed in 1974.
 - (vii) Two (2) Side Draw Loadout Bin 15, with a maximum capacity of 20,000 bushels/hr and installed in 1978.
 - (viii) Two (2) Side Draw Loadout Bin 17, with a maximum capacity of 20,000 bushels/hr and installed in 1980.
 - (ix) Side Draw Loadout Bin 21, with a maximum capacity of 10,000 bushels/hr and installed in 1993.
 - (x) Side Draw Loadout Bin 25, with a maximum capacity of 10,000 bushels/hr and installed in 1999.
- (f) Paved and unpaved roads, identified as EP-6.
- (g) Two (2) temporary ground piles, identified as EP-7, with a combined maximum capacity of 1,400,000 bushels.
- (h) One (1) temporary ground pile with a maximum capacity of 1,000,000 bushels per year, approved for operation in 2010.
- (i) Twenty-five (25) storage bin vents, identified as EP-8, with a combined maximum capacity 4,285,685 bushels.
- (i) Seven (7) concrete silos with a combined maximum capacity of 314,970 bushels.
 - (ii) Seventeen (17) steel bins with a combined maximum capacity of 3,871,662 bushels.
 - (iii) One (1) flat building with a maximum capacity of 99,053 bushels.

Note: In 1999, the permanent storage capacity for this grain elevator increased to greater than the 2.5 million U.S. bushels applicability threshold for the New Source Performance Standard (NSPS) Standards of Performance for Grain Elevators (40 CFR 60, Subpart DD).

Under the New Source Performance Standard (NSPS) Standards of Performance for Grain Elevators (40 CFR 60, Subpart DD) each truck unloading station, truck loading station, railcar loading station, railcar unloading station, and grain dryer, and all grain handling operations that were constructed, modified, or reconstructed in 1999 or later are considered affected facilities.

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

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

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

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

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

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

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

Emissions Unit	Maximum Capacity (bushels/hour)	Process Weight Rate (tons per hour)	326 IAC 6-3-2 Allowable PM Emission Rate (pounds per hour)
Truck Receiving - House Pit	10,000	300	63.0
Truck Receiving - Penalty Box	3,500	105	51.8
Truck Receiving - North Pit, Middle Pit and South Pit	15,000 (each)	450 (each)	67.7 (each)
Internal Handling Operation	2283	68.5	47.6
House Cleaner	10,000	300	63.0
GSI Cleaner	12,000	360	65.1
Grain Dryers	6,800	204	58.7
Truck Loadout Bin 5	15,000	450	67.7
Truck Loadout Bin 6	15,000	450	67.7
Truck Loadout Bin 19	10,000	300	63.0
Truck Load out Bin 20	10,000	300	63.0
Rail Loadout	40,000	1200	80.0
Side Draw Loadout Bin 13	10,000	300	63.0
Side Draw Loadout Bin 15	20,000	600	71.2
Side Draw Loadout Bin 17	20,000	600	71.2
Side Draw Loadout Bin 21	10,000	300	63.0
Side Draw Loadout Bin 25	10,000	300	63.0
One (1) Temporary Ground Pile	15,000	450	67.7
One (1) Temporary Ground Pile	15,000	450	67.7
Temporary Ground Pile	15,000	450	67.7
Seven (7) Concrete Silos	10,000 (each)	300 (each)	63.0 (each)
Seventeen (17) Steel Bins	28,500	855	75.6
Flat Building	3,500	105	51.8

When the process weight rate exceeds two hundred (200) tons per hour, the maximum allowable emission may exceed the emission rate derived by the equation above, provided the concentration of particulate matter in the discharge gases to the atmosphere is less than 0.10 pounds per one thousand (1,000) pounds of gases.

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

A Preventive Maintenance Plan is required for this facility. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the baffles associated with each of the three (3) truck receiving pits (North Pit, Middle Pit, and South Pit) shall be in operation and control particulate emissions from the respective receiving pit at all times the receiving pits are in operation.

Compliance Monitoring Requirements [326 IAC 2-6.1-3]

D.1.4 Visible Emissions Notations

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

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain a daily record of visible emission notations of the grain elevator stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION E.1

FACILITY OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) internal handling operation, identified as EP-2, with a maximum capacity of 600,000 tons/yr (20,000,000 bushels/yr), constructed between 1962 and 2006, modified by 2013, consisting of conveyors, legs, drags, loadouts, belts, distributors and augers.
- (e) Twelve (12) truck/rail shipping units, identified as EP-5, with a combined maximum capacity of 160,000 bushels/hr:
 - (i) Truck Loadout Bin 5, with a maximum capacity of 15,000 bushels/hr and installed in 2004.
 - (ii) Truck Loadout Bin 6, with a maximum capacity of 15,000 bushels/hr and installed in 2004.
 - (x) Side Draw Loadout Bin 25, with a maximum capacity of 10,000 bushels/hr and installed in 1999.

Note: In 1999, the permanent storage capacity for this grain elevator increased to greater than the 2.5 million U.S. bushels applicability threshold for the New Source Performance Standard (NSPS) Standards of Performance for Grain Elevators (40 CFR 60, Subpart DD).

Under the New Source Performance Standard (NSPS) Standards of Performance for Grain Elevators (40 CFR 60, Subpart DD) each truck unloading station, truck loading station, railcar loading station, railcar unloading station, and grain dryer, and all grain handling operations that were constructed, modified, or reconstructed in 1999 or later are considered affected facilities.

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

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

- (a) The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the grain handling operations, except when otherwise specified in 40 CFR 60, Subpart DD.
- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:

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

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

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

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

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

Compliance Determination Requirements

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

Not later than 180 days of after issuance of MSOP No. 073-31260-00021, in order to comply with Condition E.1.2, the Permittee shall perform the performance testing required under NSPS 40 CFR 60, Subpart DD, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	ADM Grain Co
Address:	9179 W State Road 14
City:	Rensselaer, Indiana 47978
Phone #:	(217) 424-5200
MSOP #:	M073-31260-00021

I hereby certify that ADM Grain Co is:

still in operation.

no longer in operation.

I hereby certify that ADM Grain Co is:

in compliance with the requirements of MSOP M073-31260-00021.

not in compliance with the requirements of MSOP M073-31260-00021.

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

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

Noncompliance:

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Technical Support Document (TSD) for an Administrative Amendment to a
Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	ADM Grain Company
Source Location:	9179 W State Road 14, Rensselaer, IN 47978
County:	Jasper
SIC Code:	5153 (Grain and Field Beans)
Operating Permit No.:	M073-31260-00021
Operating Permit Issuance Date:	June 27, 2012
Administrative Amendment No.:	073-33343-00021
Permit Reviewer:	Madhurima Moulik

On June 24, 2013, the Office of Air Quality (OAQ) received an application from ADM Grain Company related to a modification to an existing stationary grain elevator.

Existing Approvals

The source was issued MSOP (Renewal) No. M073-31260-00021 on June 27, 2012. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Jasper County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Jasper County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Jasper County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10)

tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) Other Criteria Pollutants
Jasper County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7; however, there is an applicable New Source Performance Standard that was in effect on August 7, 1980. Therefore, fugitive emissions, from the affected facility to which the New Source Performance Standard is applicable, are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by ADM Grain Company on June 24, 2013, relating to the modifications to the internal handling operation at the source.

The following is a list of the new and modified emission units:

- (a) One (1) drag conveyor to reclaim grain from Bin 15. (Note: This unit will replace an existing farm auger.)
- (b) Extend an existing drag conveyor to reclaim grain from Bins 26, 14, and 15.

There is no increase in emissions due to this modification. The throughput used for calculating emissions from the grain elevator remains unchanged

Enforcement Issues

There are no pending enforcement actions related to this Administrative Amendment.

Emission Calculations

The source-wide emissions from this grain processing facility have been updated. The internal handling steps included in the calculations have been reduced from six (6) to four (4) according to AP-42 guidance on grain elevators.

There are no increases in emissions of regulated pollutants as a result of this recalculation.

See Appendix A of this TSD for detailed emission calculations.

PTE of the Entire Source - Updated

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values).

(Note: The PTE table from the TSD and Appendix A of MSOP Renewal No. M073-31260-00021 issued on June 27, 2012 has been modified as follows in order to correct an error in the calculation of emissions from internal handling operations. Pursuant to AP-42, the number of internal handling steps for a grain elevator including dryers is a maximum of four. In the MSOP renewal, the number of internal handling steps was erroneously assumed to be six).

Process/ Emission Unit	Potential To Emit of the Entire Source Before Control (tons/year)									Worst Single HAP	
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs		
Grain Processing/Elevator	197.4 160.5	89.5 69.1	15.24 11.76	0	0	0	0	0	0	0	0
Propane Dryers	0.75	2.61	2.61	0.37	48.5	3.73	28.0	47644	0	0	0
Temporary Storage Piles (loading and unloading)	9.94	3.63	0.62	0	0	0	0	0	0	0	0
Temporary Storage Piles (wind erosion)	2.92	1.02	1.02	0	0	0	0	0	0	0	0
Unpaved Roads	6.24	1.59	0.26	0	0	0	0	0	0	0	0
Total PTE of Entire Source	246.9 180.3	98.3 77.9	19.6 16.2	0.37	48.5	3.73	28.0	47644	0	0	0
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10	
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA	
*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are considered "regulated air pollutants".											
**PM _{2.5} listed is direct PM _{2.5} .											

MSOP Status

- (a) This amendment to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).
- (b) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

The federal rule applicabilities remain unchanged as a result of this amendment.

State Rule Applicability Determination

The state rule applicabilities remain unchanged as a result of this amendment.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

1. Sections A.2, D.1 and E.1 have been amended in order to incorporate the changes to the internal handling operation. (Note: The emissions calculations in the MSOP renewal were estimated at 600,000 tons or 20,000,000 bushels per year. There is no increase in throughput in the internal handling operation as a result of this amendment).
2. Condition D.1.1 – Particulate Matter [326 IAC 6-3-2] has been amended to correct the particulate matter emission limitation for the internal handling operation under 326 IAC 6-3-2.

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Five (5) truck receiving facilities, identified as EP-1, with a combined maximum capacity of 58,500 bushels/hr:

Note: 1 bushel = 60 pounds

- (i) Truck Receiving - House Pit, with a maximum capacity of 10,000 bushels/hr, installed in 1974.

.....

- (b) One (1) internal handling operation, identified as EP-2, with a maximum capacity of **600,000 tons/yr (20,000,000 4,800 bushels/hr yr)**, constructed between 1962 and 2006, **modified in 2013**, consisting of **conveyors**, legs, drags, loadouts, belts, distributors and augers.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Five (5) truck receiving facilities, identified as EP-1, with a combined maximum capacity of 58,500 bushels/hr:

Note: 1 bushel = 60 pounds

- (i) Truck Receiving - House Pit, with a maximum capacity of 10,000 bushels/hr, installed in 1974.

...

- (b) One (1) internal handling operation, identified as EP-2, with a maximum capacity of **600,000 tons/yr (20,000,000 4,800 bushels/hr yr)**, constructed between 1962 and 2006, **modified by 2013**, consisting of **conveyors**, legs, drags, loadouts, belts, distributors and augers.

- (c) Two (2) grain cleaners, identified as EP-3, with a combined maximum capacity of 22,000 bushels/hr :

...

SECTION E.1 FACILITY OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) internal handling operation, identified as EP-2, with a maximum capacity of **600,000 tons/yr (20,000,000 1,800 bushels/hr yr)**, constructed between 1962 and 2006, **modified in 2013**, consisting of **conveyor**, legs, drags, loadouts, belts, distributors and augers.
- (e) Twelve (12) truck/rail shipping units, identified as EP-5, with a combined maximum capacity of 160,000 bushels/hr :
 - (i) Truck Loadout Bin 5, with a maximum capacity of 15,000 bushels/hr and installed in 2004.
 - (ii) Truck Loadout Bin 6, with a maximum capacity of 15,000 bushels/hr and installed in 2004.
 - (x) Side Draw Loadout Bin 25, with a maximum capacity of 10,000 bushels/hr and installed in 1999.

Note: In 1999, the permanent storage capacity for this grain elevator increased to greater than the 2.5 million U.S. bushels applicability threshold for the New Source Performance Standard (NSPS) Standards of Performance for Grain Elevators (40 CFR 60, Subpart DD).

Under the New Source Performance Standard (NSPS) Standards of Performance for Grain Elevators (40 CFR 60, Subpart DD) each truck unloading station, truck loading station, railcar loading station, railcar unloading station, and grain dryer, and all grain handling operations that were constructed, modified, or reconstructed in 1999 or later are considered affected facilities.

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

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

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

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

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

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

Emissions Unit	Maximum Capacity (bushels/hour)	Process Weight Rate (tons per hour)	326 IAC 6-3-2 Allowable PM Emission Rate (pounds per hour)
Truck Receiving - House Pit	10,000	300	63.0
Truck Receiving - Penalty Box	3,500	105	51.8
Truck Receiving - North Pit, Middle Pit and South Pit	15,000 (each)	450 (each)	67.7 (each)
Internal Handling Operation	1,800 2283	54 68.5	45.3 47.6
House Cleaner	10,000	300	63.0
GSI Cleaner	12,000	360	65.1
Grain Dryers	6,800	204	58.7
Truck Loadout Bin 5	15,000	450	67.7

Truck Loadout Bin 6	15,000	450	67.7
Truck Loadout Bin 19	10,000	300	63.0
Truck Load out Bin 20	10,000	300	63.0
Rail Loadout	40,000	1200	80.0
Side Draw Loadout Bin 13	10,000	300	63.0
Side Draw Loadout Bin 15	20,000	600	71.2
Side Draw Loadout Bin 17	20,000	600	71.2
Side Draw Loadout Bin 21	10,000	300	63.0
Side Draw Loadout Bin 25	10,000	300	63.0
One (1) Temporary Ground Pile	15,000	450	67.7
One (1) Temporary Ground Pile	15,000	450	67.7
Temporary Ground Pile	15,000	450	67.7
Seven (7) Concrete Silos	10,000 (each)	300 (each)	63.0 (each)
Seventeen (17) Steel Bins	28,500	855	75.6
Flat Building	3,500	105	51.8

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 24, 2013.

The construction and operation of this proposed amendment shall be subject to the conditions of the attached proposed MSOP Administrative Amendment No 073-33343-00021. The staff recommends to the Commissioner that this MSOP Administrative Amendment be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Madhurima Moulik 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) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

TSD Appendix A: Emission Calculations
Emissions Summary

Company Name: ADM Grain Company
Source Address: 9179 W. State Road 14, Rensselaer, IN 47978
Permit No.: 073-33343-00021
Reviewer: Madhurima Moulik 25-Jul-13

Process Description	Unlimited/Uncontrolled Potential to Emit (PTE) (tons/year)*										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Non-Fugitive and Fugitive Emissions**											
Grain Elevator (grain receiving, handling, storage, and shipping)	160.5	69.1	11.76	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---
Dryers	0.75	2.61	2.61	0.37	48.5	3.73	28.0	47644	0.0	0.0	---
Temporary Storage Piles (loading and unloading)	9.94	3.63	0.62	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---
Temporary Storage Piles (wind erosion)	2.92	1.02	1.02	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---
Unpaved Roads***	6.24	1.59	0.16	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---
Totals	180.3	77.9	16.2	0.37	48.5	3.73	28.0	47644	0.0	0.0	---

Process Description	Limited/Controlled Potential to Emit (PTE) (tons/year)*										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Non-Fugitive and Fugitive Emissions**											
Grain Elevator (grain receiving, handling, storage, and shipping)	70.1	24.1	4.10	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---
Dryers	0.75	2.61	2.61	0.4	48.5	3.73	28.0	47644	0.0	0.0	---
Temporary Storage Piles (loading and unloading)	9.94	3.63	0.62	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---
Temporary Storage Piles (wind erosion)	2.92	1.02	1.02	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---
Unpaved Roads***	6.24	1.59	0.16	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---
Totals	89.9	33.0	8.5	0.37	48.5	3.73	28.0	47644	0.0	0.0	---

Notes:

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

**This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, however, there is an applicable New Source Performance Standard that was in effect on August 7, 1980, therefore fugitive emissions, from the affected facility to which the New Source Performance Standard is applicable, are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

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

TSD Appendix A: Emission Calculations
Grain Elevator: Grain Receiving, Handling, Storage, and Shipping

Company Name: ADM Grain Company
Source Address: 9179 W. State Road 14, Rensselaer, IN 47978
Permit No.: 073-33343-00021
Reviewer: Madhurima Moulik

25-Jul-13

Bulk Density of Grain = 60 lbs/bushel

1. Potential Grain Throughput Calculations

Potential Grain Throughput = 20,000,000 (bushels/year)
 Potential Grain Throughput = 600,000 (tons/year)

Total number of internal handling steps = 4
 Potential Internal Handling Throughput = 2,400,000 tons/year

2. PTE Calculations

Emissions Unit Description	Potential Grain Throughput (tons/yr)	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	PM2.5 Emission Factor (lbs/ton)	Control Device(s)	Collection and Control Efficiency (%)	PTE of PM Before Control (tons/yr)	PTE of PM10 Before Control (tons/yr)	PTE of PM2.5 Before Control (tons/yr)	PTE of PM After Control (tons/yr)	PTE of PM10 After Control (tons/yr)	PTE of PM2.5 After Control (tons/yr)
Receiving - Straight Truck	600,000	0.18	0.059	0.010	None	0%	54.00	17.70	3.00	54.00	17.70	3.00
Internal Handling	2,400,000	0.061	0.034	0.0058	Enclosed	90%	73.20	40.80	6.96	7.32	4.08	0.70
Loadout - Truck **	600,000	0.086	0.029	0.0049	Socks on Spouts	95%	25.80	8.70	1.47	1.29	0.44	0.07
Storage - Silos and Bins	600,000	0.025	0.0063	0.0011	None	0%	7.50	1.89	0.33	7.50	1.89	0.33
Totals							160.50	69.09	11.76	70.1	24.11	4.10

Methodology

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

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

Potential Grain Throughput (tons/year) = [Potential Grain Throughput (bushels/year)] * [60 lbs/bushel] * [ton/2000 lbs]

Potential Internal Handling Throughput (tons/year) = [Potential Grain Throughput (bushels/year)] * [Total number of internal handling steps]

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

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

Appendix A: Emission Calculations

LPG-Propane

(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)

Company Name: ADM Grain Company
Source Address: 9179 W. State Road 14, Rensselaer, IN 47978
Permit No.: 073-33343-00021
Reviewer: Madhurima Moulik 25-Jul-13

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

SO2 Emission factor = 0.10 x S
 S = Sulfur Content =

1.00 grains/100ft³

77.86

7454.23

Emission Factor in lb/kgal	Pollutant						
	PM*	PM10*	direct PM2.5**	SO2 (0.10S)	NOx	VOC 1.0 **TOC value	CO 7.5
Potential Emission in tons/yr	0.75	2.61	2.61	0.37	48.45	3.73	27.95

*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-1, therefore PM10 is based on the filterable and condensable PM emission factors.

** No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)

Propane Emission Factors shown. Please see AP-42 for butane.

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

See Page 2 for Greenhouse Gas calculations.

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updated 7/11

**Appendix A: Emission Calculations
LPG-Propane - Industrial Boilers
(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)
Greenhouse Gas**

Company Name: ADM Grain Company
Source Address: 9179 W. State Road 14, Rensselaer, IN 47978
Permit No.: 073-31260-00021
Reviewer: Deena Patton

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/kgal	12,500	0.2	0.9
Potential Emission in tons/yr	46,589	0.75	3.35
Summed Potential Emissions in tons/yr	46,593		
CO2e Total in tons/yr	47,644		

Methodology

The CO2 Emission Factor for Propane is 12500. The CO2 Emission Factor for Butane is 14300.
Emission Factors are from AP 42 (7/08), Table 1.5-1 (SCC #1-02-010-02)
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/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).

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updated 7/11

Appendix A: Emissions Calculations
Loading and Unloading of Temporary Grain Storage Piles

Company Name: ADM Grain Company
Source Address: 9179 W. State Road 14, Rensselaer, IN 47978
Permit No.: 073-33343-00021
Reviewer: Madhurima Moulik 25-Jul-13

Annual Grain Throughput 2,400,000 bushels/year
 Annual Grain Throughput 72,000 tons/year*

Storage Pile Loading and Unloading			AP-42 Emission Factors**			Potential Emissions (lbs/hr)			Potential Emissions (tons/yr)		
Type of Activity	Type of Emissions	Annual Grain Throughput (tons/year)	PM	PM10	PM2.5	PM	PM10	PM2.5	PM	PM10	PM2.5
Unloading grain from truck to storage pile conveyor	Non-Fugitive	72,000	0.180	0.059	0.010	1.48	0.48	0.08	6.48	2.12	0.36
Unloading grain from storage pile conveyor to storage pile	Fugitive	72,000	0.061	0.034	0.0058	0.50	0.28	0.05	2.20	1.22	0.21
Unloading bulk products from storage pile to hopper truck	Fugitive	72,000	0.035	0.0078	0.0013	0.29	0.06	0.011	1.26	0.28	0.05
Totals						1.77	0.55	0.09	9.94	3.63	0.62

ADM has 3 temporary storage piles with a maximum capacity of 2,400,000 bushels/year

* It is assumed that 1 bushel = 60 pounds.

** AP-42 Factors are from Table 9.9.1-1. Particulate Emission Factors for Grain Elevators

Methodology

Potential Emissions (lbs/hr) = [Annual Grain Throughput (tons/year)] * [Emission factor (lbs/ton)] * [year/8760 hours]

Potential Emissions (tons/yr) = [Annual Grain Throughput (tons/year)] * [Emission factor (lbs/ton)] * [ton/2000 lbs]

TSD Appendix A: Emission Calculations
Fugitive Dust Emissions from Open Storage Pile Wind Erosion

Company Name: ADM Grain Company
Source Address: 9179 W. State Road 14, Rensselaer, IN 47978
Permit No.: 073-33343-00021
Reviewer: Madhurima Moulik

25-Jul-13

Material Storage Piles (AP-42 Section 11.2.3)

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8,760 hours of use and USEPA's AP-42 (Pre 1983 Edition), Section 11.2.3.

$$E_f = 1.7 \cdot (s/1.5)^3 \cdot (365-p)/235 \cdot (f/15)$$

where E_f = emission factor (lb/acre/day)
 s = silt content (wt %)
 p = 125 days of rain greater than or equal to 0.01 inches
 f = 15 % of wind greater than or equal to 12 mph

Storage Pile*	Materials	Worst Case Silt Content (wt %)*	Emission Factor (lb/acre/day)	Maximum Anticipated Pile Size (acres)**	Unlimited PTE of PM (Before Control) (tons/yr)	Unlimited PTE of PM10/PM2.5 (Before Control) (tons/yr)
Open Storage Pile	grain	4.6	5.32	6.00	5,830	2,041
Totals PTE (Before Control) =					5.83	2.04
Dust Control Efficiency =					50.0%	50.0%
Totals PTE (After Control) =					2.92	1.02

Methodology

**Maximum pile size (acres) provided by the source

Unlimited PTE of PM (tons/yr) = (Emission Factor (lb/acre/day)) * (Maximum Pile Size (acres)) * (ton/2000 lbs) * (8760 hours/yr)

Unlimited PTE of PM10 (tons/yr) = (Potential PM Emissions (tons/yr)) * 35%

*Worst case silt content of grain assumed equal to the silt content of coal at a iron and steel production facility (AP-42 Table 13.2.4-1, dated 11/2006)

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

Company Name: ADM Grain Company
Source Address: 9179 W. State Road 14, Rensselaer, IN 47978
Permit No.: 073-33343-00021
Reviewer: Madhurima Moulik **25-Jul-13**

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)
Vehicle (entering plant) (one-way trip)	25.0	1.0	25.0	60.0	1500.0	600	0.114	2.8	1036.9
Vehicle (leaving plant) (one-way trip)	25.0	1.0	25.0	40.0	1000.0	600	0.114	2.8	1036.9
Totals			50.0		2500.0			5.7	2073.9

Average Vehicle Weight Per Trip =

50.0	tons/trip
------	-----------

Average Miles Per Trip =

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	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 =	50.0	50.0	50.0	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, Eext = $E \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$
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, Ef =	9.15	2.33	0.23	lb/mile
Mitigated Emission Factor, Eext =	6.02	1.53	0.15	lb/mile

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)
Vehicle (entering plant) (one-way trip)	4.74	1.21	0.12	3.12	0.80	0.08
Vehicle (leaving plant) (one-way trip)	4.74	1.21	0.12	3.12	0.80	0.08
Totals	9.49	2.42	0.24	6.24	1.59	0.16

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
PM Emissions From the Grain Handling, Storage and Drying Processes
Demonstration of Compliance with 326 IAC 6-3-2

TSD App A, Page 8 of 8

Company Name: ADM Grain Company
Source Address: 9179 W. State Road 14, Rensselaer, IN 47978
Permit No.: 073-33343-00021
Reviewer: Madhurima Moulik 25-Jul-13

Allowable Emissions Under 326 IAC 6-3-2

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (tons/hr)	PM Emission Factor (lbs/ton)	Control Device(s)	Collection and Control Efficiency (%)	PM Emissions Before Control (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)	PM Emissions After Control (lbs/hr)
Truck Receiving - House Pit	10,000	300.00	0.18	NA	0%	54.00	63.0	54.00
Truck Receiving - Penalty Box	3,500	105.0	0.18	NA	0%	18.90	51.8	18.90
Truck Receiving - North Pit	15,000	450.0	0.18	baffles	50%	81.00	67.7	40.50
Truck Receiving - Middle Pit	15,000	450.0	0.18	baffles	50%	81.00	67.7	40.50
Truck Receiving - South Pit	15,000	450.0	0.18	baffles	50%	81.00	67.7	40.50
Internal Handling Operation	1,800	54	0.061	NA	0%	3.3	45.3	3.25
House Cleaner	10,000	300	0.061	NA	0%	18.3	63.0	18.30
GSI Cleaner	12,000	360	0.061	NA	0%	21.96	65.1	21.96
Zimmerman VT5046 Dryer	5,000	150	0.061	NA	0%	9.15	55.4	9.15
Zimmerman VT1816 Dryer	1,500	45	0.061	NA	0%	2.75	43.6	2.75
Truck Loadout Bin 5	15,000	450	0.061	NA	0%	27.45	67.7	27.45
Truck Loadout Bin 6	15,000	450	0.061	NA	0%	27.5	67.7	27.45
Truck Loadout Bin 19	10,000	300	0.061	Sock on Spouts	95%	18.3	63.0	0.92
Truck Loadout Bin 20	10,000	300	0.061	Sock on Spouts	95%	18.3	63.0	0.92
Rail Loadout	40,000	1,200	0.061	Sock on Spouts	95%	73.2	80.0	3.66
Side Draw Loadout Bin 13	10,000	300	0.061	NA	0%	18.3	63.0	18.30
Side Draw Loadout Bin 15	20,000	600	0.061	NA	0%	36.6	71.2	36.60
Side Draw Loadout Bin 17	20,000	600	0.061	NA	0%	36.6	71.2	36.60
Side Draw Loadout Bin 21	10,000	300	0.061	NA	0%	18.3	63.0	18.30
Side Draw Loadout Bin 25	10,000	300	0.061	NA	0%	18.3	63.0	18.30
Temporary Ground Pile	15,000	450	0.061	NA	0%	27.5	67.7	27.45
Temporary Ground Pile	15,000	450	0.061	NA	0.00%	27.5	67.7	27.45
Temporary Ground Pile	15,000	450	0.061	NA	0.00%	27.5	67.7	27.45
Seven (7) Concrete Silos*	10,000	300	0.025	NA	0.00%	7.5	63.0	7.50
Seventeen (17) Steel Bins**	28,500	855	0.025	NA	0.00%	21.4	75.6	21.38
Flat Building	3,500	105	0.061	NA	0%	6.4	51.8	6.41

*The Maximum (bushels/hr) is per emission unit 335,800 1.15

**The Maximum (bushels/hr) is a combined amount.

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

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

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

When the process weight rate exceeds two hundred (200) tons per hour, the maximum allowable emission may exceed the emission rate derived by the equation above, provided the concentration of particulate matter in the discharge gases to the atmosphere is less than 0.10 pounds per one thousand (1,000) pounds of gases.

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

Methodology

Maximum Grain Throughput (tons/hr) = Maximum Grain Throughput (bushels/hr) x 60 (lbs/bushel) x 1 ton/2000 lbs
PTE of PM/PM10 Before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton)
PTE of PM/PM10 After Control (tons/yr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton) x (1- Control Efficiency (%))



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Governor

Thomas W. Easterly
Commissioner

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

TO: Dustin Lindahl
ADM Grain Company
9179 W State Road 14
Rensselaer, IN 47978

DATE: August 1, 2013

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

SUBJECT: Final Decision
Administrative Amendment to MSOP
073-33343-00021

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:
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	PWAY 8/1/2013 ADM Grain Company 073-33343-00021 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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											Remarks
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2		Jeffrey J Becker VP - US Grain Ops ADM Grain Company 4666 Faries Pkwy Decatur IL 46525 (RO CAATS)									
3		Jasper County Commissioners 115 W. Washington Street Rensselaer IN 47978 (Local Official)									
4		Jasper County Health Department 105 W. Kellner St Rensselaer IN 47978-2623 (Health Department)									
5		Mr. Kenny Haun P.O. Box 280 Rensselaer IN 47978 (Affected Party)									
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