



# 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: October 24, 2013  
RE: Monsanto Company / 073-33570-00035  
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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Michael R. Pence  
Governor

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John Sturges  
Monsanto Company  
P.O. Box 35, 15849 South U.S Highway 231  
Remington, IN 47977

October 24, 2013

Re: 073-33570-00035  
Second Significant Revision to  
F073-30542-00035

Dear Mr. Sturges:

Monsanto Company was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F073-30542-00035 on November 20, 2012 for a stationary hybrid corn seed processing plant located at 15849 S US Hwy 231, Remington, Indiana. On August 23, 2013, the Office of Air Quality (OAQ) received an application from the source requesting significant permit revision to this permit.

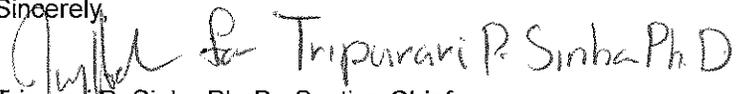
Each baghouse controlling the three (3) identical shellers are identical in configuration, therefore the source requested to revise the existing stack test condition to only require one representative unit to be stack tested every five years.

The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

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 Swarna Prabha, of my staff, at 317-234-5376 or 1-800-451-6027, and ask for extension 4-5376.

Sincerely,

  
Tripurani P. Sinha Ph. D., Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document and revised permit

TS/SP

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



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# Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Monsanto Company  
15849 S US Hwy 231  
Remington, Indiana 47977**

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

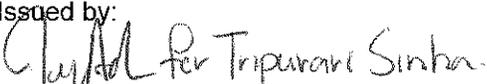
The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F073-30542-00035	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 20, 2012  Expiration Date: November 20, 2022

First Significant Permit Revisions No.: 073-32601-00035

Second Significant Permit Revisions No.: 073-33570-00035	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: October 24, 2013  Expiration Date: November 20, 2022

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**SECTION A****SOURCE SUMMARY**

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

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

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The Permittee owns and operates a stationary hybrid corn seed processing plant.

Source Address:	15849 S US Hwy 231, Remington, Indiana 47977
General Source Phone Number:	219-261-2122
SIC Code:	0723
County Location:	Jasper
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

**(a) Husking Receiving**

- (1) Two (2) receiving lines, identified as Corn Receiving 1 and Corn Receiving 2, consisting of two (2) huskers, identified as Husker 1 and Husker 2, which each consist of seven (7) husking beds, constructed in 1976, modified in 1995, 2007, 2008, and 2013 exhausting to general ventilation, capacity: 2,000 bushels (112,000 pounds) of ear corn per hour for each line and each husker.
- (2) Two (2) corn receiving lines identified as Corn Receiving 3 and Corn Receiving 4, consisting of two (2) huskers, identified as Husker 3 and Husker 4, which each consist of seven (7) husking beds, constructed in 2007 and modified in 2008, exhausting to general ventilation, capacity: 2,000 bushels (112,000 pounds) of ear corn per hour for each line and each husker.

**(b) Drying**

- (1) Two (2) natural gas-fired bin dryers, identified as Dry 1 and Dry 2, exhausting to Stacks Dry 1 and Dry 2, constructed in 1976, with heat input capacities of sixty (60) million British thermal units per hour, each, and a dry rate of 20,238 bushels per batch (500 bushels (28,000 pounds) per hour, each).
- (2) Two (2) gas-fired bin dryers, identified as Dry 3 and Dry 4, approved for construction in 2007 and 2008, exhausting to Stack Dry 3 and Stack Dry 4, with a drying rate of 500 bushels (28,000 pounds) per hour and a heat input capacity of 160 million British thermal units per hour, equipped with eighteen (18) storage bins each, identified as Dry 3 Bins and Dry 4 Bins, used for drying with a capacity of 2,000 bushels (112,000 pounds), each.
- (3) Two (2) gas-fired bin dryers, identified as Dry 5 and Dry 6, approved for construction in 2008, 2009 and approved for modification in 2013, exhausting to Stack Dry 5 and Stack Dry 6, with a drying rate of 778 bushels (43,568 pounds)

per hour and a heat input capacity of 252 million British thermal units per hour (28 burners x 9 MMBtu/burner), equipped with eighteen (28) storage bins each, identified as Dry 5 Bins and Dry 6 Bins, used for drying with a capacity of 2,000 bushels (112,000 pounds), each.

(c) Shelling/Bulk Storage

- (1) One (1) corn sheller, identified as Sheller 1, constructed in 2007, exhausting to a baghouse for particulate control, identified as CE15a, capacity: 2,500 bushels (140,000 pounds) of corn per hour.
- (2) One (1) corn sheller, identified as Sheller 2, constructed in 2007, exhausting to a baghouse for particulate control, identified as CE15b, capacity: 2,500 bushels (140,000 pounds) of corn per hour.
- (3) One (1) corn sheller, identified as Sheller 3, approved for construction in 2013, exhausting to a baghouse for particulate control, identified as CE15c, capacity: 2,500 bushels (140,000 pounds) of corn per hour.
- (4) Four (4) aspirators, identified as Sheller Aspirator 1 and Sheller Aspirator 2, constructed in 2009, Sheller Aspirator 3, and Sheller Aspirator 4, approved for construction in 2013, exhausting to baghouse CE16 for particulate control, with a capacity of 2,500 bushels (140,000 pounds) of corn per hour, each.
- (5) Two hundred and forty eight (248) bulk storage bins, identified as 451.01-451.31, 452.01-452.31, 453.01-453.31, 454.01-454.31, 455.01-455.31, 456.01-456.31, 457.01-457.31 and 458.01-458.31 constructed in 1999, 2007, 2008, 2009, and 2013 exhausting to a baghouse for particulate control, identified as CE-35 (Harvest Dust System).
  - (a) Storage bins 451.01-451.31, 454.01-454.31, 455.01-455.31 and 458.01-458.31 have a capacity of 7,500 bushels (420,000 pounds) each.
  - (b) Storage bins 452.01-452.31, 453.01-453.31, 456.01-456.31 and 457.01-457.31 have a capacity of 5,000 bushels (280,000 pounds) each.
- (6) One (1) shelled corn loadout operation, identified as Shelled Corn Loadout, approved for construction in 2013, with a maximum capacity of 2,500 bushels per hour (140,000 pounds) exhausting to a baghouse for particulate control, identified as CE-34r (House Dust System).
- (7) Four (4) shelled corn loadout bins, identified as 31.830, 31.840, 31.850 and 31.860 approved for construction in 2013 with a capacity of 2,500 bushels per hour (140,000 pounds) exhausting to a baghouse for particulate control, identified as CE-34R (House Dust System). Each bin has a capacity of 2,580 bushels (144,480 Lbs).
- (8) Four (4) cob bins, identified as 31.810, 31.820, 31.870 and 31.880 approved for construction in 2013. Each has a capacity of 2,832 cubic feet (48,144 pounds) and are utilized for cob loadout exhausting to a baghouse for particulate control, identified as CE-35 (Harvest Dust System).
- (9) One (1) dust bin, identified as 31.900 approved for construction in 2013 and has a capacity of 3,000 cubic feet (60,000 pounds) and utilized for dust loadout exhausting to a baghouse for particulate control, identified as CE-35 (Harvest Dust System).

- (10) One (1) shelled corn receiving, identified as Shelled Corn Receiving approved for construction in 2013 and has a capacity of 5,000 bushels per hour (280,000 pounds) exhausting to a baghouse for particulate control, identified as CE-35 (Harvest Dust System).

(d) Conditioning

- (1) One (1) Tower Reclaim conveyor grain handling system with a capacity of 2,500 bushels per hour (140,000 pounds) exhausting to a baghouse for particulate control, identified as CE-34R (House Dust System).
- (2) Two (2) cleaners, identified as Cleaner Line 1 and Cleaner Line 2, constructed in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector 1 and White Dust Collector 2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.
- (3) Two (2) sorters, identified as Sorter Line 1 and Sorter Line 2, constructed in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector 1 and White Dust Collector 2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.
- (4) Two (2) sizers, identified as Sizer Line 1 and Sizer Line 2, constructed in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector 1 and White Dust Collector 2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.
- (5) Sixteen (16) gravity tables, identified as Gravity Tables Line 1 and Gravity Tables Line 2, constructed in 2007, equipped with sixteen (16) dust collectors for particulate control, identified as Gravity Table Dust Collectors 1 through 16, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
- (6) Twenty-four (24) storage bins, identified as Storage Bins Lines 1 and Storage Bins Line 2, constructed in 2007, throughput capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.

(e) Treating/Packaging

- (1) Three (3) aspirators, identified as Aspirator 1 through 3, constructed in 2007, exhausting to a baghouse, identified as Red Dust Collector, capacity: 1,500 bushels (84,000 pounds) of shelled corn per hour, total.
- (2) One (1) treater, identified as Treater 3, constructed in 1994, modified in 2005, equipped with a baghouse for particulate control, identified as Red Dust Collector, capacity: 500 bushels (28,000 pounds) of shelled corn per hour.
- (3) Two (2) treaters, identified as Treater 1 and 2, constructed in 2007, exhausting to a baghouse, identified as Red Dust Collector, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
- (4) Twelve (12) storage bins, identified as Treating and Packing Storage Bins 1 through 12, constructed in 2007, each exhausting to a baghouse, identified as Red Dust Collector, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
- (5) One (1) bagging machine, identified as EU12, constructed in 1994, modified in 2005, equipped with a baghouse for particulate control, identified as Red Dust

Collector, capacity: 2,400 bushels per hour (134,400 pounds per hour) of seed corn per hour.

- (6) One (1) seed pak filler, identified as Seed Pak Filler, approved for construction in 2010, with a maximum capacity of 1,500 bushels per hour (84,000 pounds per hour), with particulate emissions vented to baghouse CE14.
- (7) One (1) refuge scale, identified as Refuge Scale 1, constructed in 2010, with a maximum capacity of 270 bushels per hour (15,120 pounds per hour), with particulate emissions vented to Red Dust Collector.
- (8) One (1) refuge scale, identified as Refuge Scale 2, constructed in 2010, with a maximum capacity of 270 bushels per hour (15,120 pounds per hour), with particulate emissions vented to baghouse CE14.
- (9) One (1) seed corn debagger, identified as EU34, constructed in 2002, exhausting to a baghouse, identified as Red Dust Collector, maximum throughput: 1,000 bushels (56,000 pounds) of seed corn per hour.
- (10) One (1) small lot bagging operation, constructed in 2005, approved for modification in 2013 consisting of a debagger identified as small lot debagger EU106, the CBT-100 treater, identified as EU102, an aspirator, identified as EU103, and bagging unit 2, identified as EU104, exhausting to a baghouse, identified as CE14, capacity: 1,000 ~~3,550~~ bushels (56,000~~198,800~~ pounds) per hour, total.

Calculations indicate that the baghouses, identified as the Red Dust Collector, CE14, CE34, CE35, White Dust Collectors 1&2 and Gravity Table Dust Collectors 1-16 do not have to be operated in order for the associated emission units to comply with 326 IAC 6-3-2.

#### A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, with no boilers.
- (b) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to one thousand (1,000) and annual throughputs less than twelve thousand (12,000) gallons.
  - (2) Vessels storage the following: hydraulic oils, lubricating oils, machining oils, and machining fluids.
- (c) Paved and unpaved roads and parking lots with public access.
- (d) One Central Vacuum system identified as Sheller Central Vac for general clean up.

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

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

**SECTION B GENERAL CONDITIONS****B.1 Definitions [326 IAC 2-8-1]**

---

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

**B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

---

- (a) This permit, F073-30542-00035, 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 [326 IAC 2-8-6] [IC 13-17-12]**

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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 [326 IAC 2-8-4(4)]**

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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 [326 IAC 2-8-4(5)(D)]**

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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 [326 IAC 2-8-4(5)(E)]**

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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.

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**B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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**B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 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
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]**

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

The Permittee shall implement the PMPs.

(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. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.12 Emergency Provisions [326 IAC 2-8-12]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865

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

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

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

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

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

## (C) Corrective actions taken.

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

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

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

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

- (a) All terms and conditions of permits established prior to F073-30542-00035 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.

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

**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:
- Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue

MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.19 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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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 FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

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

#### B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

#### B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

#### B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

**SECTION C****SOURCE OPERATION CONDITIONS**

Entire Source
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**Emission Limitations and Standards [326 IAC 2-8-4(1)]****C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

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

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

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

**(a) Pursuant to 326 IAC 2-8:**

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

**C.3 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of 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]

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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]

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]****C.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 2-8-4][326 IAC 2-8-5(a)(1)]****C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

**C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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

**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]****C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.
- Records of required monitoring information include the following:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
  - (BB) The dates analyses were performed.
  - (CC) The company or entity that performed the analyses.
  - (DD) The analytical techniques or methods used.
  - (EE) The results of such analyses.
  - (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

#### **C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

**SECTION D.1****EMISSIONS UNIT OPERATION CONDITIONS****Emissions Unit Description:****(a) Husking Receiving**

- (1) Two (2) receiving lines, identified as Corn Receiving 1 and Corn Receiving 2, consisting of two (2) huskers, identified as Husker 1 and Husker 2, which each consist of seven (7) husking beds, constructed in 1976, modified in 1995, 2007, 2008, and 2013 exhausting to general ventilation, capacity: 2,000 bushels (112,000 pounds) of ear corn per hour for each line and each husker.
- (2) Two (2) corn receiving lines identified as Corn Receiving 3 and Corn Receiving 4, consisting of two (2) huskers, identified as Husker 3 and Husker 4, which each consist of seven (7) husking beds, constructed in 2007 and modified in 2008, exhausting to general ventilation, capacity: 2,000 bushels (112,000 pounds) of ear corn per hour for each line and each husker.

**(b) Drying**

- (1) Two (2) natural gas-fired bin dryers, identified as Dry 1 and Dry 2, exhausting to Stacks Dry 1 and Dry 2, constructed in 1976, with heat input capacities of sixty (60) million British thermal units per hour, each, and a dry rate of 20,238 bushels per batch (500 bushels (28,000 pounds) per hour, each).
- (2) Two (2) gas-fired bin dryers, identified as Dry 3 and Dry 4, approved for construction in 2007 and 2008, exhausting to Stack Dry 3 and Stack Dry 4, with a drying rate of 500 bushels (28,000 pounds) per hour and a heat input capacity of 160 million British thermal units per hour, equipped with eighteen (18) storage bins each, identified as Dry 3 Bins and Dry 4 Bins, used for drying with a capacity of 2,000 bushels (112,000 pounds), each.
- (3) Two (2) gas-fired bin dryers, identified as Dry 5 and Dry 6, approved for construction in 2008, 2009 and approved for modification in 2013, exhausting to Stack Dry 5 and Stack Dry 6, with a drying rate of 778 bushels (43,568 pounds) per hour and a heat input capacity of 252 million British thermal units per hour (28 burners x 9 MMBtu/burner), equipped with eighteen (28) storage bins each, identified as Dry 5 Bins and Dry 6 Bins, used for drying with a capacity of 2,000 bushels (112,000 pounds), each.

**(c) Shelling/Bulk Storage**

- (1) One (1) corn sheller, identified as Sheller 1, constructed in 2007, exhausting to a baghouse for particulate control, identified as CE15a, capacity: 2,500 bushels (140,000 pounds) of corn per hour.
- (2) One (1) corn sheller, identified as Sheller 2, constructed in 2007, exhausting to a baghouse for particulate control, identified as CE15b, capacity: 2,500 bushels (140,000 pounds) of corn per hour.
- (3) One (1) corn sheller, identified as Sheller 3, approved for construction in 2013, exhausting to a baghouse for particulate control, identified as CE15c, capacity: 2,500 bushels (140,000 pounds) of corn per hour.
- (4) Four (4) aspirators, identified as Sheller Aspirator 1 and Sheller Aspirator 2, constructed in 2009, Sheller Aspirator 3, and Sheller Aspirator 4, approved for construction 2013 exhausting to baghouse CE16 for particulate control, with a capacity of 2,500 bushels

(140,000 pounds) of corn per hour, each.

- (5) Two hundred and forty eight (248) bulk storage bins, identified as 451.01-451.31, 452.01-452.31, 453.01-453.31, 454.01-454.31, 455.01-455.31, 456.01-456.31, 457.01-457.31 and 458.01-458.31 constructed in 1999, 2007, 2008, 2009, and 2013 exhausting to a baghouse for particulate control, identified as CE-35 (Harvest Dust System).
    - (a) Storage bins 451.01-451.31, 454.01-454.31, 455.01-455.31 and 458.01- 458.31 have a capacity of 7,500 bushels (420,000 pounds) each.
    - (b) Storage bins 452.01-452.31, 453.01-453.31, 456.01-456.31 and 457.01- 457.31 have a capacity of 5,000 bushels (280,000 pounds) each.
  - (6) One (1) shelled corn loadout operation, identified as Shelled Corn Loadout, approved for construction in 2013, with a maximum capacity of 2,500 bushels per hour (140,000 pounds) exhausting to a baghouse for particulate control, identified as CE-34r (House Dust System).
  - (7) Four (4) shelled corn loadout bins, identified as 31.830, 31.840, 31.850 and 31.860 approved for construction in 2013 with a capacity of 2,500 bushels per hour (140,000 pounds) exhausting to a baghouse for particulate control, identified as CE-34R (House Dust System). Each bin has a capacity of 2,580 bushels (144,480 Lbs).
  - (8) Four (4) cob bins, identified as 31.810, 31.820, 31.870 and 31.880 approved for construction in 2013. Each has a capacity of 2,832 cubic feet (48,144 pounds) and are utilized for cob loadout exhausting to a baghouse for particulate control, identified as CE-35 (Harvest Dust System).
  - (9) One (1) dust bin, identified as 31.900 approved for construction in 2013 and has a capacity of 3,000 cubic feet (60,000 pounds) and utilized for dust loadout exhausting to a baghouse for particulate control, identified as CE-35 (Harvest Dust System).
  - (10) One (1) shelled corn receiving, identified as Shelled Corn Receiving approved for construction in 2013 and has a capacity of 5,000 bushels per hour (280,000 pounds) exhausting to a baghouse for particulate control, identified as CE-35 (Harvest Dust System).
- (d) Conditioning
- (1) One (1) Tower Reclaim conveyor grain handling system with a capacity of 2,500 bushels per hour (140,000 pounds) exhausting to a baghouse for particulate control, identified as CE-34R (House Dust System).
  - (2) Two (2) cleaners, identified as Cleaner Line 1 and Cleaner Line 2, constructed in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector 1 and White Dust Collector 2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.
  - (3) Two (2) sorters, identified as Sorter Line 1 and Sorter Line 2, constructed in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector 1 and White Dust Collector 2, capacity: 500 bushels (28,000 pounds) of shelled corn per hour, each.
  - (4) Two (2) sizers, identified as Sizer Line 1 and Sizer Line 2, constructed in 2007, exhausting to two (2) baghouses for particulate control, identified as White Dust Collector 1 and White Dust Collector 2, capacity: 500 bushels (28,000 pounds) of shelled corn per

hour, each.

- (5) Sixteen (16) gravity tables, identified as Gravity Tables Line 1 and Gravity Tables Line 2, constructed in 2007, equipped with sixteen (16) dust collectors for particulate control, identified as Gravity Table Dust Collectors 1 through 16, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (6) Twenty-four (24) storage bins, identified as Storage Bins Lines 1 and Storage Bins Line 2, constructed in 2007, throughput capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
- (e) Treating/Packaging
- (1) Three (3) aspirators, identified as Aspirator 1 through 3, constructed in 2007, exhausting to a baghouse, identified as Red Dust Collector, capacity: 1,500 bushels (84,000 pounds) of shelled corn per hour, total.
  - (2) One (1) treater, identified as Treater 3, constructed in 1994, modified in 2005, equipped with a baghouse for particulate control, identified as Red Dust Collector, capacity: 500 bushels (28,000 pounds) of shelled corn per hour.
  - (3) Two (2) treaters, identified as Treater 1 and 2, constructed in 2007, exhausting to a baghouse, identified as Red Dust Collector, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (4) Twelve (12) storage bins, identified as Treating and Packing Storage Bins 1 through 12, constructed in 2007, each exhausting to a baghouse, identified as Red Dust Collector, capacity: 1,000 bushels (56,000 pounds) of shelled corn per hour, total.
  - (5) One (1) bagging machine, identified as EU12, constructed in 1994, modified in 2005, equipped with a baghouse for particulate control, identified as Red Dust Collector, capacity: 2,400 bushels (134,400 pounds) of seed corn per hour.
  - (6) One (1) seed pak filler, identified as Seed Pak Filler, approved for construction in 2010, with a maximum capacity of 1,500 bushels per hour (84,000 pounds per hour), with particulate emissions vented to baghouse CE14.
  - (7) One (1) refuge scale, identified as Refuge Scale 1, constructed in 2010, with a maximum capacity of 270 bushels per hour (15,120 pounds per hour), with particulate emissions vented to Red Dust Collector.
  - (8) One (1) refuge scale, identified as Refuge Scale 2, constructed in 2010, with a maximum capacity of 270 bushels per hour (15,120 pounds per hour), with particulate emissions vented to baghouse CE14.
  - (9) One (1) seed corn debagger, identified as EU34, constructed in 2002, exhausting to a baghouse, identified as Red Dust Collector, maximum throughput: 1,000 bushels (56,000 pounds) of seed corn per hour.
  - (10) One (1) small lot bagging operation, constructed in 2005, approved for modification in 2013 consisting of a debagger identified as small lot debagger EU106, the CBT-100 treater, identified as EU102, an aspirator, identified as EU103, and bagging unit 2, identified as EU104, exhausting to a baghouse, identified as CE14, capacity: 1,000 bushels (56,000 pounds) per hour, total.

Calculations indicate that the baghouses, identified as the Red Dust Collector, CE14, CE34,

CE35, White Dust Collectors 1&2 and Gravity Table Dust Collectors 1-16 do not have to be operated in order for the associated emission units to comply with 326 IAC 6-3-2.

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

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

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the following emission units and control devices shall not exceed the pounds per hour limitation when operating at the stated process weight rates calculated using the following equations:

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

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

or

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

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

Emission Unit	Control Device	Process Weight Rate (tons per hour)	326 IAC 6-3-2 Allowable Particulate Emission Rate (pounds per hour)
Corn Receiving 1, 2, 3, and 4	none	56.0, each	45.64, each
Huskers 1, 2, 3, and 4, part of Corn Receiving 1, 2, 3, and 4	none	56.0, each	45.64, each
Dryers Dry 1, 2, 3, and 4	none	14.0, each	24.03, each
Dryers Dry 5 and 6	none	22.0, each	32.31
Sheller 1	Baghouse CE15a	70.0	47.77
Sheller 2	Baghouse CE15b	70.0	47.77
Sheller 3	Baghouse CE15c	70.0	47.77
Sheller Aspirators 1	Baghouse CE16	70.0	47.77
Sheller Aspirators 2	Baghouse CE16	70.0	47.77
Sheller Aspirators 3	Baghouse CE16	70.0	47.77
Sheller Aspirators 4	Baghouse CE16	70.0	47.77
248 Bulk Storage Bins	Baghouse CE35 (Harvest Dust System)	28.0, each	38.23, each
Shelled Corn Loadout	Baghouse CE34r (House Dust System)	70.0	47.77
Loadout Bins 1 through 4	Baghouse CE34r (House Dust system)	70.0	47.77
4 Cob Loadout Bins (31.810, 31.820, 31.870, 31.880)	Baghouse CE35 (Harvest Dust System)	24.0	34.55
Dust Bin (31.9100)	Baghouse CE35 (Harvest Dust System)	30.0	40.04
Shelled Corn Receiving	Baghouse CE35 (Harvest Dust System)	140.0	54.72
Cleaners, Sorters, Sizers Line 1	White Dust Collector 1	28.0, each	38.23, each
Cleaners, Sorters, Sizers Line 2	White Dust Collector 2	28.0, each	38.23, each

Emission Unit	Control Device	Process Weight Rate (tons per hour)	326 IAC 6-3-2 Allowable Particulate Emission Rate (pounds per hour)
Eight (8) Gravity Tables, Line 1	Gravity Table Dust Collectors 1 through 8	1.75, each	5.97, each
Eight (8) Gravity Tables, Line 2	Gravity Table Dust Collectors 9 through 16	1.75, each	5.97, each
Storage Bins, Lines 1 and 2	none	28.0	38.23, each
Aspirators 1 through 3	Red Dust Collector	28.0	38.23, each
Treaters 1 through 3	Red Dust Collector	42.0	42.97, each
Treating and Packing Storage Bins 1 through 12	Red Dust Collector	28.0	38.23, each
Bagging Machine EU12	Red Dust Collector	67.2	47.37
Seed Pak Filler	Baghouse CE14	42.0	42.97
Refuge Scale 1	Red Dust Collector	7.56	15.90
Refuge Scale 2	Baghouse CE14	7.56	15.90
Debagger EU34	Red Dust Collector	28.0	38.23
Small Lot Bagging EU102 through EU104	Baghouse CE14	99.4	51.22
Debagger EU106	Baghouse CE14	28.0	38.23
Internal Handling	None	28.0	39.35

#### D.1.2 Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-2]

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

- (a) The PM emissions from the four (4) corn receiving lines, identified as Corn Receiving 1, 2, 3, and 4, four (4) huskers, identified as Husker 1, 2, 3, and 4, six (6) natural gas-fired bin dryers, identified as Dry 1, 2, 3, 4, 5, and 6 (grain drying), two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, which are all part of the two (2) corn handling lines, identified as Lines 1 and 2, the one (1) bagging machine, identified as EU12, the one (1) small lot bagging operation, consisting of EU102 through EU104 and the one (1) Seed Pak Filler, shall be limited to less than the throughput and emission limits specified in the following table:

Emission Units (Control Device)	Limited Corn Throughput (tons/yr*)	PM Emission Limit (lbs PM/ton corn)
Corn Receiving 1, 2, 3, and 4	Facility throughput 200,000 (wet ear)	0.035
Huskers 1, 2, 3, and 4	Facility throughput 200,000 (wet ear)	0.061
Dryers 1, 2, 3, 4, 5, and 6	Facility throughput 200,000 (wet ear)	0.47
Sheller Aspirators 1, 2, 3, and 4 (Baghouse CE16)	Facility throughput 150,000 (dry shelled corn)	0.061
Bulk Storage Bins, 4 Cob Loadout Bins, Dust Bin 31.900 (Baghouse CE35)	Facility throughput	0.025

<b>Emission Units (Control Device)</b>	<b>Limited Corn Throughput (tons/yr*)</b>	<b>PM Emission Limit (lbs PM/ton corn)</b>
4 Shelled Corn Loadout Bins (Baghouse CE34r) Storage Bins Lines 1 & 2 Treating and Packaging Storage Bins (Red Dust Collector)	150,000 (dry shelled corn)	
Shelled Corn Loadout Operation (Baghouse CE34r)	Facility throughput 150,000 (dry shelled corn)	0.086
Shelled Corn Receiving (Baghouse CE35)	Facility throughput 150,000 (dry shelled corn)	0.035
Bagging Machine EU12, Small Lot Bagging (EU-102-104), and Internal Handling	Facility throughput 150,000 (dry shelled corn)	0.061

\*Note that "yr" represents twelve (12) consecutive month period, with compliance determined at the end of each month.

- (b) Combined Shellers 1, 2 and 3 shall be limited to 7,500 hours per year and PM limit of 0.768 lb/hr.

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

#### D.1.3 PM10 and PM2.5 Emission Limitations [326 IAC 2-8-4] [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) The PM<sub>10</sub> and PM<sub>2.5</sub> emissions from the four (4) corn receiving lines, identified as corn receiving 1, 2, 3, and 4, four (4) huskers, identified as Husker 1, 2, 3, and 4, six (6) natural gas-fired bin dryers, identified as Dry 1, 2, 3, 4, 5, and 6 (grain drying), two (2) cleaners, identified as Cleaners Lines 1 and 2, the two (2) sorters, identified as Sorters Lines 1 and 2, the two (2) sizers, identified as Sizers Lines 1 and 2, and the sixteen (16) gravity tables, identified as Gravity Tables Lines 1 and 2, which are all part of the two (2) corn handling lines, identified as Lines 1 and 2, the one (1) bagging machine, identified as EU12, the one (1) small lot bagging operation, consisting of EU102 through EU104, and the one (1) Seed Pak Filler, shall be limited to less than the throughput and emission limits specified in the following table:

<b>Emission Units (Control Device)</b>	<b>Limited Corn Throughput (tons/yr*)</b>	<b>PM<sub>10</sub> Emission Limit (lbs PM<sub>10</sub>/ton corn)</b>	<b>PM<sub>2.5</sub> Emission Limit (lbs PM<sub>2.5</sub>/ton corn)</b>
Corn Receiving 1, 2, 3, and 4	Facility throughput 200,000 (wet ear)	0.0078	0.0013
Huskers 1, 2, 3, and 4	Facility throughput 200,000 (wet ear)	0.034	0.0058
Dryers 1, 2, 3, 4, 5, and 6	Facility throughput 200,000 (wet ear)	0.12	0.020
Sheller Aspirators 1, 2, 3, and 4 (Baghouse CE16)	Facility throughput 150,000 (dry shelled corn)	0.034	0.0058
Bulk Storage Bins, 4 Cob Loadout Bins, Dust Bin 31.900 (Baghouse CE35) 4 Shelled Corn Loadout Bins (Baghouse CE34r) Storage Bins Lines 1 & 2 Treating and Packaging Storage Bins (Red Dust Collector)	Facility throughput 150,000 (dry shelled corn)	0.063	0.0011
Shelled Corn Loadout Operation (Baghouse CE34r)	Facility throughput 150,000 (dry shelled corn)	0.029	0.0049
Shelled Corn Receiving (Baghouse CE35)	Facility throughput 150,000 (dry shelled corn)	0.0078	0.0013
Bagging Machine EU12, Small Lot Bagging (EU-102-104), and Internal Handling	Facility throughput 150,000 (dry shelled corn)	0.034	0.0058

\*Note that "yr" represents twelve (12) consecutive month period, with compliance determined at the end of each month.

- (b) Combined Shellers 1,2 and 3 shall be limited to 7,500 hours per year and PM limit of 0.0.768 lb/hr.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 each to less than 100 tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, and rendered the requirements of 326 IAC 2-2 (PSD) not applicable for PM10.

#### D.1.4 Fuel Combustion Limitations [326 IAC 2-8-4] [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

- (a) The total amount of natural gas combusted in all the emission units shall not exceed 1,126.9 million cubic feet (MMCF) per twelve (12) consecutive month period, with compliance determined at the end of each month;
- (b) NOx emissions from natural gas shall not exceed 100 pounds per million cubic foot (lb/MMCF);
- (c) CO emissions from natural gas shall not exceed 84 pounds per million cubic foot (lb/MMCF);

Compliance with these limits, combined with the NOx, CO, from all other emission units at the source, shall limit the source-wide total NOx and CO emissions to less than 100 tons per twelve

(12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the entire source.

#### D.1.5 Volatile Organic Compounds (VOCs) Limitations [326 IAC 8-1-6] [326 IAC 2-2] [326 IAC 2-8-4]

In order to render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

- (a) VOC input to each of the four (4) seed treaters, identified as Treaters 1 through 3, and CBT-100 shall be less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Combined VOC input to all the seed treaters, shall be less than ninety (90.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable to seed treaters 1 through 3 and CBT-100.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at the source, shall limit the source-wide total VOC emissions to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the entire source.

#### D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### **Compliance Determination Requirements**

#### D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall perform PM, PM<sub>10</sub>, and PM<sub>2.5</sub> testing for:

- (a) three (3) shellers exhausting to following baghouses: CE15a, CE15b and CE15c respectively; and
- (b) sheller aspirator 1, sheller aspirator 2, sheller aspirator 3, sheller aspirator 4 baghouse: CE16

utilizing methods as approved by the Commissioner. These tests shall be repeated on a different baghouse for each sheller at least once every five (5) years from the date of the last valid compliance demonstration. Testing on a baghouse shall not be repeated until each baghouse in each sheller group has been tested. The sheller aspirators exhausting to baghouse, CE16 shall be tested every five (5) years. 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. PM<sub>10</sub> and PM<sub>2.5</sub> includes filterable and condensable particulate matter.

#### D.1.8 Particulate Control

- (a) In order to comply with Conditions D.1.2 and D.1.3, the baghouses, identified as CE15a, CE15b, CE15c, and CE16, for particulate control shall be in operation and control emissions from the three (3) Shellers, identified as Sheller 1, Sheller 2, Sheller 3, and the

4 Sheller Aspirators, identified as Sheller Aspirators 1, Sheller Aspirator 2, Sheller Aspirator 3, and Sheller Aspirator 4, and at all times that the emission units are in operation.

- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.1.9 Broken or Failed Bag Detection

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse(s) pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

### Compliance Monitoring Requirements

#### D.1.10 Visible Emissions Notations

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- (a) Visible emission notations of the baghouses, identified as CE15a, CE15b, CE15c, and CE16 shall be performed once per day 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.

#### D.1.11 Baghouse Parametric Monitoring

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- (a) The Permittee shall record the pressure drop across the baghouses, identified as CE15a, CE15b, CE15c, and CE16, used in conjunction with the three (3) Shellers, identified as Sheller 1, Sheller 2, Sheller 3, and the 4 Sheller Aspirators, identified as Sheller

Aspirators 1, Sheller Aspirator 2, Sheller Aspirator 3, and Sheller Aspirator 4. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for these units is a pressure drop between 1.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

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

#### D.1.12 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.2 and D.1.3, the Permittee shall maintain records of the facility's throughput of wet ear and dry shelled corn and the number of operating hours of Sheller 1, Sheller 2, and Sheller 3 each compliance period.
- (b) To document the compliance status with Condition D.1.4(a), the Permittee shall maintain records of the amount of natural gas combusted in all the emission units each month and each compliance period.
- (c) To document the compliance status with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limitations established in Condition D.1.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used for each treater.
  - (2) The amount of coating material and solvent less water used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each treater each month;
  - (4) The total VOC input to each treater each month and each compliance period.
- (d) To document the compliance status with Condition D.1.9, the Permittee shall maintain daily records of visible emission notations of each of the three (3) Shellers, identified as Sheller 1, Sheller 2, Sheller 3, and the 4 Sheller Aspirators, identified as Sheller Aspirators 1, Sheller Aspirator 2, Sheller Aspirator 3, and Sheller Aspirator 4, exhausts. 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).
- (e) To document the compliance status with Condition D.1.10, the Permittee shall maintain daily records of the pressure drop across the baghouses identified as baghouses, identified as CE15a, CE15b, CE15c, and CE16. The Permittee shall include in its daily

record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

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

#### D.1.13 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.2, D.1.3, D.1.4(a) and D.1.5 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Source Name: Monsanto Company  
Source Address: 15849 S US Hwy 231, Remington, Indiana 47977  
FESOP Permit No.: F073-30542-00035

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)\_\_\_\_\_
- Report (specify)\_\_\_\_\_
- Notification (specify)\_\_\_\_\_
- Affidavit (specify)\_\_\_\_\_
- Other (specify)\_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Monsanto Company  
Source Address: 15849 S US Hwy 231, Remington, Indiana 47977  
FESOP Permit No.: F073-30542-00035

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"> <li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li> <li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li> </ul> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
 Source Address: 15489 S US Hwy 231, Remington, Indiana 47977  
 FESOP No.: F073-30542-00035  
 Facilities: Facility wide  
 Parameter: Wet Ear Throughput  
 Limit: 200,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Wet Ear Throughput (tons)	Wet Ear Throughput (tons)	Wet Ear Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
 Source Address: 15489 S US Hwy 231, Remington, Indiana 47977  
 FESOP No.: F073-30542-00035  
 Facilities: Facility wide  
 Parameter: Dry Shelled Corn Throughput  
 Limit: 150,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Dry shelled Corn Throughput (tons)	Dry Shelled Corn Throughput (tons)	Dry shelled Corn Throughput (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
 Source Address: 15489 S US Hwy 231, Remington, Indiana 47977  
 FESOP No.: F073-30542-00035  
 Facilities: Sheller 1, Sheller 2 and Sheller 3  
 Parameter: Operating hours  
 Limit: 7,500 hours per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Number of Operating Hours	Number of Operating Hours	Number of Operating Hours
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
 Source Address: 15489 S US Hwy 231, Remington, Indiana 47977  
 FESOP No.: F073-30542-00035  
 Facility: All Combustion Emission Units  
 Parameter: Natural Gas Usage  
 Limit: The total amount of natural gas combusted in all the emission units shall not exceed 1,126.9 million cubic feet (MMCF) per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Natural Gas Usage (MMCF)	Natural Gas Usage (MMCF)	Natural Gas Usage (MMCF)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
 Source Address: 15489 S US Hwy 231, Remington, Indiana 47977  
 FESOP No.: F073-30542-00035  
 Facility: Treater 1  
 Parameter: VOC Input  
 Limit: Less than twenty-five (25.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	VOC Input (tons)	VOC Input (tons)	VOC Input (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
 Source Address: 15489 S US Hwy 231, Remington, Indiana 47977  
 FESOP No.: F073-30542-00035  
 Facility: Treater 2  
 Parameter: VOC Input  
 Limit: Less than twenty-five (25.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	VOC Input (tons)	VOC Input (tons)	VOC Input (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
 Source Address: 15489 S US Hwy 231, Remington, Indiana 47977  
 FESOP No.: F073-30542-00035  
 Facility: Treater 3  
 Parameter: VOC Input  
 Limit: Less than twenty-five (25.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	VOC Input (tons)	VOC Input (tons)	VOC Input (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
 Source Address: 15489 S US Hwy 231, Remington, Indiana 47977  
 FESOP No.: F073-30542-00035  
 Facility: Treater CBT-100  
 Parameter: VOC Input  
 Limit: Less than twenty-five (25.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	VOC Input (tons)	VOC Input (tons)	VOC Input (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Monsanto Company  
 Source Address: 15489 S US Hwy 231, Remington, Indiana 47977  
 FESOP No.: F073-30542-00035  
 Facility: Seed Treaters1 through 3, and Treater CBT-100  
 Parameter: VOC Input  
 Limit: Less than Ninety (90.0) tons per twelve consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	VOC Input (tons)	VOC Input (tons)	VOC Input (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Source Name: Monsanto Company  
 Source Address: 15849 S US Hwy 231, Remington, Indiana 47977  
 FESOP Permit No.: F073-30542-00035

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP)**

**Source Description and Location**

Source Name:	Monsanto Company
Source Location:	15849 S US Hwy 231, Remington, IN 47977
County:	Jasper
SIC Code:	0723 (Crop Preparation Services for Market, Except Cotton Ginning)
Operation Permit No.:	F 073-30542-00035
Operation Permit Issuance Date:	November 20, 2012
Significant Permit Revision No.:	073-33570-00035
Permit Reviewer:	Swarna Prabha

On August 23, 2013, the Office of Air Quality (OAQ) received an application from Monsanto Company related to a modification to an existing source.

**Existing Approvals**

The source was issued FESOP Renewal No. F073-30542-00035 on November 20, 2012. The source has since received Significant Permit Revision No.: 073-32601-00035, issued on April 9, 2013.

**County Attainment Status**

The source is located in Jasper County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, 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. Jasper 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>**  
Jasper 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  
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**

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.

#### **Status of the Existing Source**

This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than or limited to less than two hundred fifty (<250) tons per year, emissions of GHGs are limited to less than one hundred thousand (<100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year, and it is not in one of the twenty-eight (28) listed source categories.

#### **Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Monsanto Company on August 23, 2013, relating to the following modifications regarding performance testing:

Each baghouse controlling the three (3) identical shellers are identical in configuration, therefore the source requested to revise the existing stack test condition to only require one representative unit to be stack tested every five years.

#### **Enforcement Issues**

There are no pending enforcement actions related to this revision.

#### **Emission Calculations**

There is no change in emissions for this proposed revision.

#### **Permit level Determination - FESOP Revision**

Pursuant to 326 IAC 2-8-11.1(f)(1)(I), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision reduces to testing of one unit instead of three identical process units.

#### **Federal Rule Applicability Determination**

**NSPS:**

There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

**NESHAP:**

There are no new National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

**CAM (Compliance Assurance Monitoring) [40 CFR 64]:**

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in this proposed revision, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

**State Rule Applicability Determination**

There no change in the state rules applicability to the proposed revision.

**Compliance Determination, Monitoring and Testing Requirements**

- (a) There is no change in the compliance monitoring requirements applicable to this proposed revision:
- (b) The testing requirements applicable to this proposed revision are as follows:

Testing Requirements				
Emission Unit	Control Device	Pollutant	Frequency of Testing	Limit or Requirement
Sheller 1	(Baghouse CE15a)	PM PM10 PM2.5	one unit every five (5) years; <i>unit tested may not be the same as was tested during the previous demonstration</i>	0.768 lb/hr 0.768 lb/hr 0.768 lb/hr
Sheller 2	(Baghouse CE15b)	PM PM10 PM2.5		0.768 lb/hr 0.768 lb/hr 0.768 lb/hr
Sheller 3	(Baghouse CE15c)	PM PM10 PM2.5		0.768 lb/hr 0.768 lb/hr 0.768 lb/hr

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: F073-30542-00035, issued on November 20, 2012.

**Proposed Changes**

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

The Compliance Determination Requirements for Shellers have been revised as follows:

...

**Compliance Determination Requirements**

**D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]**

~~Not later than five (5) years from the most recent compliant stack test, in order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall perform PM, PM10, and PM2.5 testing for the three (3) Shellers, identified as Sheller 1 exhausting to Baghouse CE15a, Sheller 2 exhausting to Baghouse CE15b, and Sheller 3 exhausting to Baghouse CE15c, and the 4 Sheller Aspirators, identified as Sheller Aspirators 1, Sheller Aspirator 2, Sheller Aspirator 3, and Sheller Aspirator 4 all exhausting to baghouse CE16, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section G – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition. PM10 includes filterable and condensable PM10.~~

**In order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall perform PM, PM<sub>10</sub>, and PM<sub>2.5</sub> testing for:**

- (a) **three (3) shellers exhausting to following baghouses: CE15a, CE15b and CE15c respectively and;**
- (b) **sheller aspirator 1, sheller aspirator 2, sheller aspirator 3, sheller aspirator 4 baghouse: CE16**

utilizing methods as approved by the Commissioner. These tests shall be repeated on a different baghouse for each sheller at least once every five (5) years from the date of the last valid compliance demonstration. Testing on a baghouse shall not be repeated until each baghouse in each sheller group has been tested. The sheller aspirators exhausting to baghouse, CE16 shall be tested every five (5) years. 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. PM<sub>10</sub> and PM<sub>2.5</sub> includes filterable and condensable particulate matter.

\*\*\*  
**Additional Changes**

IDEM, OAQ has made additional revisions to the permit as described below. The operating permit has been revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

**Change 1:** Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate for four Sheller Aspirators has been separated by individual units. Also, the allowable particulate emission rate table listed by stack/exhaust and baghouse has been deleted because it was a repetition of the existing table.

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

**D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the following emission units and control devices shall not exceed the pounds per hour limitation when operating at the stated process weight rates calculated using the following equations:

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

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

or

\*\*\*

Emission Unit	Control Device	Process Weight Rate (tons per hour)	326 IAC 6-3-2 Allowable Particulate Emission Rate (pounds per hour)
***	***	***	***
Sheller Aspirators 1 and 2	Baghouse CE16	140, total <b>70.0</b>	54.72 <b>47.77</b>
<b>Sheller Aspirators 2</b>	<b>Baghouse CE16</b>	<b>70.0</b>	<b>47.77</b>
Sheller Aspirators 3 and 4	Baghouse CE16	140, total <b>70.0</b>	54.72 <b>47.77</b>
<b>Sheller Aspirators 4</b>	<b>Baghouse CE16</b>	<b>70.0</b>	<b>47.77</b>
***	***	***	***
Storage Bins, Lines 1 and 2	none	28.0	38.23, <b>each</b>
Aspirators 1 through 3	Red Dust Collector	28.0	38.23, <b>each</b>
Treaters 1 through 3	Red Dust Collector	42.0	42.97, <b>each</b>
Treating and Packing Storage Bins 1 through 12	Red Dust Collector	28.0, total	38.23, total <b>each</b>
***	***	***	***

In addition, several of the emission units exhaust through the same baghouse or stack. The allowable particulate pursuant to 326 IAC 6-3-2 has been tabulated by stack/exhaust and baghouse as follows:

Stack # or Exhaust	Emission Unit	Process Weight Rate (tons per hour)	PM Emission Rate (pounds per hour)
Red Dust Collector	Aspirators 1-3	Subtotal of 28.00	38.23
	Treaters 1-3	Subtotal of 42.0	42.97
	Treating and Packing Storage Bins 1 through 12	Subtotal of 28.0	38.23
	Bagging Machine EU12	Subtotal of 67.2	47.37
	Refuge Scale 1	Subtotal of 7.56	15.90
	Debagger EU 34	Subtotal of 28.0	38.23
Baghouse CE14	Refuge Scale 2	7.56	15.90
	Small Lot Bagging EU102 through EU104	99.4	51.22
	Seed Pak Filler	42.0	42.97
	Debagger EU106	28.0	38.23
Baghouse CE16	Sheller Aspirator 1 and Sheller Aspirator 2	140	54.72
	Sheller Aspirator 3 and Sheller Aspirator 4	140	54.72
Baghouse CE34r (House Dust System)	Shelled Corn Loadout Operation	70.0	70.63
	Loadout Bins 1 through 4	70.0	70.63
	Internal Handling	28.0	38.23
Baghouse CE35 (Harvest Dust System)	4 Cob Loadout Bins (31.810, 31.820, 31.870, 31.880)	24.00	34.55
	Dust Bin (31.9100)	30.0	40.04
	Shelled Corn Receiving	140.0	54.72
	248 Bulk Storage Bins	2.80	38.23
White Dust Collector 1	Cleaner, Line 1	14.0	24.03
	Sorter, Line 1	14.0	24.03
	Sizer, Line 1	14.0	24.03

White Dust Collector 2	Cleaner, Line 2	14.0	24.03
	Sorter, Line 2	14.0	24.03
	Sizer, Line 2	14.0	24.03

\*\*\*

**Change 2:** The number of hours of operation limit for all three shellers has been combined because PM emissions are limited for three shellers. There is no change in emission limits. The quarterly reporting requirements for hours of operation have been combined for all three shellers accordingly.

D.1.2 Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-2]

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

\*\*\*

(b) **Combined** Shellers 1, 2 and 3 shall be limited to ~~2,500~~ **7,500** hours per year each and PM limit of 0.768 lb/hr.

\*\*\*

D.1.3 PM10 and PM2.5 Emission Limitations [326 IAC 2-8-4] [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

\*\*\*

(b) **Combined** Shellers 1, 2 and 3 shall be limited to ~~2,500~~ **7,500** hours per year each and PM limit of 0.768 lb/hr.

\*\*\*

**FESOP Quarterly Report**

Facilities: Sheller 1, **Sheller 2, and Sheller 3**  
 Parameter: Operating Hours  
 Limit: **72,500** hours per twelve (12) consecutive month period, with compliance determined at the end of each month.

\*\*\*

**Change 3:** The limitations for CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O and Global Warming Potential factors have been removed, because Condition D.1.4(a) already limits natural gas usage in terms of MMCF/yr, which is sufficient to limit CO<sub>2</sub>e emissions from natural gas usage. Also, the natural gas usage is limited from the entire source; therefore the facilities description in the Condition D.1.4 and reporting form has been changed.

D.1.4 Fuel Combustion Limitations [326 IAC 2-8-4] [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

- (a) The total amount of natural gas **combusted in all the emission units** ~~burned in dryers Dry 1, Dry 2, Dry 3, Dry 4, Dry 5, and Dry 6~~ shall not exceed 1,126.9 million cubic feet (MMCF) per twelve (12) consecutive month period, with compliance determined at the end of each month;
- (b) NO<sub>x</sub> emissions from **natural gas** ~~dryers Dry 1, Dry 2, Dry 3, Dry 4, Dry 5, and Dry 6~~ shall not exceed 100 pounds per million cubic foot (lb/MMCF);
- (c) CO emissions from **natural gas** ~~dryers Dry 1, Dry 2, Dry 3, Dry 4, Dry 5, and Dry 6~~ shall not exceed 84 pounds per million cubic foot (lb/MMCF);
- (d) ~~carbon dioxide (CO<sub>2</sub>) emissions from natural gas combustion shall not exceed 120,000 pounds per million cubic foot (lb/MMCF);~~

- (e) ~~methane (CH<sub>4</sub>) emissions from natural gas combustion shall not exceed 2.3 pounds per million cubic foot (lb/MMCF);~~
- (f) ~~nitrous oxide (N<sub>2</sub>O) emissions from natural gas combustion shall not exceed 2.2 pounds per million cubic foot (lb/MMCF);~~
- (g) ~~the Global Warming Potential (GWP) for carbon dioxide (CO<sub>2</sub>) shall not exceed 1.0;~~
- (h) ~~the Global Warming Potential (GWP) for methane (CH<sub>4</sub>) shall not exceed 21; and~~
- (i) ~~the Global Warming Potential (GWP) for nitrous oxide (N<sub>2</sub>O) shall not exceed 310.~~

Compliance with these limits, combined with the NO<sub>x</sub>, CO, and ~~carbon dioxide equivalent emissions (CO<sub>2</sub>e)~~ from all other emission units at the source, shall limit the source-wide total NO<sub>x</sub> and CO emissions to less than 100 tons per twelve (12) consecutive month period, each, ~~the source-wide total greenhouse gas (GHG) emissions to less than 100,000 tons of carbon dioxide equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period,~~ and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

\*\*\*

#### FESOP Quarterly Report

Facilities: ~~Dryers Dry 1, Dry 2, Dry 3, Dry 4, Dry 5, and Dry 6~~ **All Combustion Emission Units**  
Parameter: Natural Gas Usage  
Limit: The total amount of natural gas **combusted in all the emission units** ~~burned in dryers Dry 1, Dry 2, Dry 3, Dry 4, Dry 5, and Dry 6~~ shall not exceed 1,126.9 million cubic feet (MMCF) per twelve (12) consecutive month period, with compliance determined at the End of each month.

\*\*\*

**Change 4:** IDEM has revised the VOC input limit for seed treater, identified as CBT-100, which is inadvertently listed as 15 tons/ per twelve (12) consecutive month period. The quarterly reporting requirements for seed treater, CBT-100 has been revised accordingly.

#### D.1.5 Volatile Organic Compounds (VOCs) Limitations [326 IAC 8-1-6] [326 IAC 2-2] [326 IAC 2-8-4]

In order to render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

- (a) VOC input to each of the **four three (3 4)** seed treaters, identified as Treaters 1 through 3 **and CBT-100**, shall be less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) **Combined** VOC input to **all the one (1)** seed treaters, ~~identified as CBT-100,~~ shall be less than ~~fifteen (15)~~ **ninety (90.0)** tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable **to seed treaters 1 through 3 and CBT-100.**

\*\*\*

#### FESOP Quarterly Report

\*\*\*

Facilities: Treater CBT-100  
Parameter: VOC Input  
Limit: Less than ~~fifteen (15.0)~~ **twenty-five (25.0)** tons per twelve consecutive month period, with compliance determined at the end of each month.

\*\*\*

**Change 5:** IDEM has added the reporting form for combined VOC input limit for seed treaters 1 through 3 and

seed treater, identified as CBT-100, to limit to less than 90.0 tons per twelve consecutive month period, which was inadvertently left out of the permit.

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

**FESOP Quarterly Report**

**Source Name:** Monsanto Company  
**Source Address:** 15489 S US Hwy 231, Remington, Indiana 47977  
**FESOP No.:** F073-30542-00035  
**Facilities:** Seed Treaters 1 through 3, and Treater CBT-100  
**Parameter:** VOC Input  
**Limit:** Less than Ninety (90.0) tons per twelve consecutive month period, with compliance determined at the end of each month

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

Month	VOC Input (tons)	VOC Input (tons)	VOC Input (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

**Submitted by:** \_\_\_\_\_

**Title / Position:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

\*\*\*

**Change 6:** Condition D.1.11, the failed bag detection is inadvertently listed under Compliance Monitoring Requirements. It has been moved under Compliance Detection section. All sections have been renumbered accordingly.

D.1.149 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

\*\*\*

**Change 7:** The description for record keeping requirements for natural gas combusted by the entire source is changed as follows:

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

D.1.12 Record Keeping Requirements

\*\*\*

- (b) To document the compliance status with Condition D.1.4(a), the Permittee shall maintain records of the amount of natural gas **combusted** used in ~~dryers Dry 1, Dry 2, Dry 3, Dry 4, Dry 5, and Dry 6~~ **all the emission units** each month.

\*\*\*

**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 August 23, 2013.

The operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 073-33570-00035. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

**IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Swarna Prabha 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 317-234-5376 or toll free at 1-800-451-6027 extension 4-5376.
- (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](http://www.in.gov/idem)



# 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:** John Sturges  
Monsanto Company  
15849 South US Highway 231  
PO Box 35  
Remington, IN 47977

**DATE:** October 24, 2013

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

**SUBJECT:** Final Decision  
Significant Revision to a Federally Enforceable State Operating Permit (FESOP)  
073-33570-00035

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:  
David Jordan, Environmental Resources Management (ERM)  
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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

October 24, 2013

TO: Remington-Carpenter Township Public Library

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

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

**Applicant Name: Monsanto Company**  
**Permit Number: 073-33570-00035**

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	VHAUN 10/24/2013 Monsanto Company 073-33570-00035 FINAL		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		John Sturges Monsanto Company PO Box 35, 15849 S US Hwy 231 Remington IN 47977 (Source CAATS)			Confirmed Delivery							
2		Remington Public Library 105 North Ohio Street Remington IN 47977 (Library)										
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)										
6		David Jordan Environmental Resources Management (ERM) 11350 North Meridian, Suite 320 Carmel IN 46032 (Consultant)										
7		Remington Town Coucil P.O. Box 70 Remington IN 47977 (Local Official)										
8												
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Total number of pieces Listed by Sender  <b>6</b>	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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