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: January 30, 2014

RE: Gavilon Grain, LLC / 139-33724-00021

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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Commissioner

Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Gavilon Grain, LLC
866 N 600 E
Rushville, Indiana 46173

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

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

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

Operation Permit No.: M139-33724-00021	
Issued by: Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 30, 2014 Expiration Date: January 30, 2024

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary grain elevator for corn, wheat, and soybeans.

Source Address:	866 N 600 E, Rushville, Indiana 46173
General Source Phone Number:	(765) 679-5211
SIC Code:	5153
County Location:	Rush
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) propane-fired grain dryer, identified as EU02, constructed in 1994, with a maximum capacity of 36.82 MMBtu/hr.

(b) One (1) grain storage silo, identified as Silo #1, with a maximum capacity of 82,752 bushels, constructed in 1982.

(c) One (1) grain storage silo, identified as Silo #2, with a maximum capacity of 82,752 bushels, constructed in 1982.

(d) One (1) grain storage silo, identified as Silo #3, with a maximum capacity of 6,017 bushels, constructed in 1982.

(e) One (1) grain storage silo, identified as Silo #4, with a maximum capacity of 14,945 bushels, constructed in 1982.

(f) One (1) grain storage silo, identified as Silo #5, with a maximum capacity of 9,711 bushels, constructed in 1982.

(g) One (1) grain storage silo, identified as Silo #6, with a maximum capacity of 9,711 bushels, constructed in 1982.

(h) One (1) grain storage silo, identified as Silo #7, with a maximum capacity of 19,409 bushels, constructed in 1982.

(i) One (1) grain storage silo, identified as Silo #8, with a maximum capacity of 83,398 bushels, constructed in 1982.

(j) One (1) grain storage silo, identified as Silo #9, with a maximum capacity of 80,489 bushels, constructed in 1982.

(k) One (1) grain storage silo, identified as Silo #10, with a maximum capacity of 10,946 bushels, constructed in 1982.

(l) One (1) grain storage silo, identified as Silo #11, with a maximum capacity of 20,706 bushels, constructed in 1982.

(m) One (1) grain storage silo, identified as Silo #12, with a maximum capacity of 83,398 bushels, constructed in 1982.

(n) One (1) grain storage silo, identified as Silo #13, with a maximum capacity of 83,398 bushels, constructed in 1982

(o) One (1) grain storage silo, identified as Silo #14, with a maximum capacity of 231,037 bushels, constructed in 2011.

(p) One (1) temporary storage ring, identified as Ring, with a maximum capacity of 799,000 bushels, constructed in 1992.

(q) Receiving, handling, and shipping equipment, including:

(1) One (1) truck dump pit, identified as North Truck Pit, with a maximum capacity of 15,000 bushels per hour (450 tons/hr), located inside a drive through two-sided enclosure, constructed in 1982, with emissions exhausted to the atmosphere;

(2) One (1) truck dump pit, identified as South Truck Pit, with a maximum capacity of 25,000 bushels per hour (750 tons/hr), located inside a drive through two-sided enclosure, constructed in 1982, with emissions exhausted to the atmosphere;

(3) East Leg, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(4) West Leg, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(5) Center Leg, with a maximum capacity of 17,500 bushels per hour, constructed in 1998;

(6) Receiving Conveyor, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(7) Top Fill, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(8) Draft Scale (Rail/Truck Loadout), with a maximum capacity of 40,000 bushels per hour (1,200 tons/hr) for rail loadout and a maximum capacity of 15,000 bushels per hour (450 tons/hr) for truck loadout, constructed in 1982;

(9) Center Reclaim Conveyor, with a maximum capacity of 30,000 bushels per hour, constructed in 2011;

(10) East Conveyor, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(11) Rail Receiving Conveyor, with a maximum capacity of 10,000 bushels per hour, constructed in 1982;

(12) Wet Conveyor, with a maximum capacity of 5,000 bushels per hour, constructed in 1994 and modified before 2007;

(13) Dry Conveyor, with a maximum capacity of 5,000 bushels per hour, constructed in 1994;

(14) Dryer, with a maximum capacity of 5,000 bushels per hour, constructed in 1994;

(15) Top Dry Fill Conveyor, with a maximum capacity of 5,000 bushels per hour, constructed in 1982;

(16) Dry Leg, with a maximum capacity of 5,000 bushels per hour, constructed in 1982;

(17) Wet Leg, with a maximum capacity of 5,000 bushels per hour, constructed in 1994;

(18) Pad Conveyor North, with a maximum capacity of 15,000 bushels per hour, constructed in 1991;

(19) Pad Conveyor South, with a maximum capacity of 15,000 bushels per hour, constructed in 1991;

(20) East Distributor, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(21) Double Distributor, with a maximum capacity of 30,000 bushels per hour, constructed in 1982;

(22) Bin 14 Fill Belt Conveyor, totally enclosed, with a maximum capacity of 30,000 bushels per hour, constructed in 2011; and

(23) Bin 14 Reclaim Drag Conveyor, totally enclosed, with a maximum capacity of 18,000 bushels per hour, constructed in 2011.

(24) One (1) side draw truck loadout spout, with a maximum loadout capacity of 15,000 bushels per hour (450 tons/hr), constructed in 2011.

(25) One (1) rail dump pit, identified as Rail Pit, with a maximum capacity of 10,000 bushels per hour (300 tons/hr), constructed in 1982, with emissions to the atmosphere; and

(26) Four (4) side draw loadout spouts, each with a maximum loadout capacity of 15,000 bushels per hour (450 tons/hr), constructed in 1982.

(r) One (1) diesel fuel storage tank, with a storage capacity of 350 gallons, constructed in 2000.

(s) One (1) liquid propane storage tank, with a storage capacity of 1,000 gallons, constructed in 1997.

(t) One (1) liquid propane storage tank, with a storage capacity of 10,000 gallons, constructed in 1982.

(u) Fugitive emissions from paved and unpaved roads. [326 IAC 6-4]

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M139-33724-00021, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

(a) All terms and conditions of permits established prior to M139-33724-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

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

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

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

B.14 Source Modification Requirement

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Violation of any conditions of this permit.

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three

(3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

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

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

C.9 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale

such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

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

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

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ

that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) propane-fired grain dryer, identified as EU02, constructed in 1994, with a maximum capacity of 36.82 MMBtu/hr.

(b) One (1) grain storage silo, identified as Silo #1, with a maximum capacity of 82,752 bushels, constructed in 1982.

(c) One (1) grain storage silo, identified as Silo #2, with a maximum capacity of 82,752 bushels, constructed in 1982.

(d) One (1) grain storage silo, identified as Silo #3, with a maximum capacity of 6,017 bushels, constructed in 1982.

(e) One (1) grain storage silo, identified as Silo #4, with a maximum capacity of 14,945 bushels, constructed in 1982.

(f) One (1) grain storage silo, identified as Silo #5, with a maximum capacity of 9,711 bushels, constructed in 1982.

(g) One (1) grain storage silo, identified as Silo #6, with a maximum capacity of 9,711 bushels, constructed in 1982.

(h) One (1) grain storage silo, identified as Silo #7, with a maximum capacity of 19,409 bushels, constructed in 1982.

(i) One (1) grain storage silo, identified as Silo #8, with a maximum capacity of 83,398 bushels, constructed in 1982.

(j) One (1) grain storage silo, identified as Silo #9, with a maximum capacity of 80,489 bushels, constructed in 1982.

(k) One (1) grain storage silo, identified as Silo #10, with a maximum capacity of 10,946 bushels, constructed in 1982.

(l) One (1) grain storage silo, identified as Silo #11, with a maximum capacity of 20,706 bushels, constructed in 1982.

(m) One (1) grain storage silo, identified as Silo #12, with a maximum capacity of 83,398 bushels, constructed in 1982.

(n) One (1) grain storage silo, identified as Silo #13, with a maximum capacity of 83,398 bushels, constructed in 1982

(o) One (1) grain storage silo, identified as Silo #14, with a maximum capacity of 231,037 bushels, constructed in 2011.

(p) One (1) temporary storage ring, identified as Ring, with a maximum capacity of 799,000 bushels, constructed in 1992.

(q) Receiving, handling, and shipping equipment, including:

(1) One (1) truck dump pit, identified as North Truck Pit, with a maximum capacity of 15,000 bushels per hour (450 tons/hr), located inside a drive through two-sided enclosure, constructed in 1982, with emissions exhausted to the atmosphere;

(2) One (1) truck dump pit, identified as South Truck Pit, with a maximum capacity of 25,000 bushels per hour (750 tons/hr), located inside a drive through two-sided enclosure, constructed in 1982, with emissions exhausted to the atmosphere;

(3) East Leg, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(4) West Leg, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(5) Center Leg, with a maximum capacity of 17,500 bushels per hour, constructed in 1998;

(6) Receiving Conveyor, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(7) Top Fill, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(8) Draft Scale (Rail/Truck Loadout), with a maximum capacity of 40,000 bushels per hour (1,200 tons/hr) for rail loadout and a maximum capacity of 15,000 bushels per hour (450 tons/hr) for truck loadout, constructed in 1982;

(9) Center Reclaim Conveyor, with a maximum capacity of 30,000 bushels per hour, constructed in 2011;

(10) East Conveyor, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(11) Rail Receiving Conveyor, with a maximum capacity of 10,000 bushels per hour, constructed in 1982;

(12) Wet Conveyor, with a maximum capacity of 5,000 bushels per hour, constructed in 1994 and modified before 2007;

(13) Dry Conveyor, with a maximum capacity of 5,000 bushels per hour, constructed in 1994;

(14) Dryer, with a maximum capacity of 5,000 bushels per hour, constructed in 1994;

(15) Top Dry Fill Conveyor, with a maximum capacity of 5,000 bushels per hour, constructed in 1982;

(16) Dry Leg, with a maximum capacity of 5,000 bushels per hour, constructed in 1982;

(17) Wet Leg, with a maximum capacity of 5,000 bushels per hour, constructed in 1994;

(18) Pad Conveyor North, with a maximum capacity of 15,000 bushels per hour, constructed in 1991;

(19) Pad Conveyor South, with a maximum capacity of 15,000 bushels per hour, constructed in 1991;

(20) East Distributor, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(21) Double Distributor, with a maximum capacity of 30,000 bushels per hour, constructed in 1982;

(22) Bin 14 Fill Belt Conveyor, totally enclosed, with a maximum capacity of 30,000 bushels per hour, constructed in 2011; and

(23) Bin 14 Reclaim Drag Conveyor, totally enclosed, with a maximum capacity of 18,000 bushels per hour, constructed in 2011.

(24) One (1) side draw truck loadout spout, with a maximum loadout capacity of 15,000 bushels per hour (450 tons/hr), constructed in 2011.

(25) One (1) rail dump pit, identified as Rail Pit, with a maximum capacity of 10,000 bushels per hour (300 tons/hr), constructed in 1982, with emissions to the atmosphere; and

(26) Four (4) side draw loadout spouts, each with a maximum loadout capacity of 15,000 bushels per hour (450 tons/hr), constructed in 1982.

(r) One (1) diesel fuel storage tank, with a storage capacity of 350 gallons, constructed in 2000.

(s) One (1) liquid propane storage tank, with a storage capacity of 1,000 gallons, constructed in 1997.

(t) One (1) liquid propane storage tank, with a storage capacity of 10,000 gallons, constructed in 1982.

(u) Fugitive emissions from paved and unpaved roads. [326 IAC 6-4]

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

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

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

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

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

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

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

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (tons/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)
North Truck Dump Pit	15,000	450	67.7
South Truck Dump Pit	25,000	750	73.9
East Leg	15,000	450	67.7
West Leg	15,000	450	67.7
Center Leg	17,500	525	69.5
Receiving Conveyor	15,000	450	67.7
Top Fill Conveyor	15,000	450	67.7
Bin 14 Fill Belt Conveyor	30,000	900	76.2
Draft Scale - Rail Loadout	40,000	1200	80.0
Draft Scale - Truck Loadout	15,000	450	67.7
Center Reclaim Conveyor	30,000	900	76.2
East Reclaim Conveyor	15,000	450	67.7
Bin 14 Reclaim Drag Conveyor	18,000	540	69.9
Rail Receiving Conveyor	10,000	300	63.0
Wet Conveyor	5,000	150	67.7
Dry Conveyor	5,000	150	55.4
Dryer	5,000	150	55.4
Top Dry Fill Conveyor	5,000	150	55.4
Dry Leg	5,000	150	55.4
Wet Leg	5,000	150	55.4
Pad Conveyor North	15,000	450	67.7
Pad Conveyor South	15,000	450	67.7
East Distributor	15,000	450	67.7
Double Distributor	30,000	900	76.2
Rail Dump Pit	10,000	300	63.0
Truck Loadout - Side Draw	15,000	450	67.7

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

A Preventive Maintenance Plan is required for the emission units identified in the table contained in Condition D.1.1 above 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 Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.3 Visible Emissions Notations

(a) Daily visible emission notations of the grain receiving, handling, drying, and shipping facilities shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping Requirements

D.1.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.3, the Permittee shall maintain daily records of the visible emission notations from the grain receiving, handling, drying, and shipping facilities. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

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

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	Gavilon Grain, LLC
Address:	866 N 600 E
City:	Rushville, Indiana 46173
Phone #:	(765) 679-5211
MSOP #:	M139-33724-00021

I hereby certify that Gavilon Grain, LLC is :

□ still in operation.
□ no longer in operation.

I hereby certify that Gavilon Grain, LLC is :

□ in compliance with the requirements of MSOP M139-33724-00021.
□ not in compliance with the requirements of MSOP M139-33724-00021.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

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

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____
_____

Attachment A
to Minor Source Operating Permit No. M139-33724-00021
Fugitive Dust Control Plan

Gavilon Grain, LLC
866 N 600 E, Rushville, Indiana 46173

Name and address of the source:
326 IAC 6-5-5(a)(1)
Gavilon Grain, LLC
866 N 600 E
Rushville, IN 46173

Name and address of the owner or operator responsible for the execution of the plan:
326 IAC 6-5-5(a)(2)
Eric Williams, Elevator Manager
Gavilon Grain, LLC
866 N 600 E
Rushville, IN 46173

Type and quantity of material handled:
326 IAC 6-5-5(a)(6)
Gavilon Grain operates a grain elevator. The elevator receives grain (typically corn, soybeans and/or wheat) from nearby farms. The potential annual throughput of the elevator is approximately 15,000,000 bushels of grain.

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

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

Number and mix of vehicular activity occurring on paved roads, unpaved roads, and parking lots:
326 IAC 6-5-5(a)(5)
Haul roads and parking areas at the elevator are unpaved. Grain is delivered from the farm by straight trucks (end dumps) and hopper bottom trucks. In recent years, the percentage of straight truck deliveries has been below 30% of incoming receipts. A portable auger and hopper bottom trucks are used for internal transfers of grain from the temporary ground storage pile to the elevator. Hopper bottom trucks are utilized for shipments. In recent years, grain shipments by truck have ranged from 10% to 90% of outbound shipments, with the remainder shipped via rail. Light duty vehicle activity is minimal (e.g. employees personal vehicles, shop truck) and these vehicles are not used to haul grain.

Equipment used to maintain pile:
326 IAC 6-5-5(a)(7)
Grain may be stored in a temporary ground storage pile. Grain is transferred to ground storage piles via belt conveyors. A portable auger is used to pick up and load grain from the pile into hopper bottom trucks for transfer to the elevator. Depending upon the length of anticipated storage, a tarpaulin may be used to cover grain stored in the pile.

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

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

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

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

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

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

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

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

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

    a) Paved roads and parking lots:
        i) Flushing;

ii) Sweeping, while wet either from rain or application of water; and/or
iii) An equivalent alternate measure.

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

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

a) Housekeeping Practices

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

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

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

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

b) Equipment Maintenance

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

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

<u>Specification of the dust suppressant material:</u>
326 IAC 6-5-5(a)(9)
Dust suppressants, approved by IDEM OAQ, may be used to control haul road emissions. Application rates will be determined based on prevailing conditions and/or manufacturer's recommendations. The decision to apply dust control to haul roads will be based on visual observations.

Specifications of the particulate matter collection equipment:
326 IAC 6-5-5(a)(10)
Particulate matter collection equipment is not utilized at the facility.
Passive control equipment (pit baffles, truck socks, conveyor enclosures, partially enclosed buildings) will be selected, installed and maintained according to manufacturer's recommendations, and/or best engineering judgment.

Schedule of compliance:
326 IAC 6-5-5(a)(11)
Not applicable.

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

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

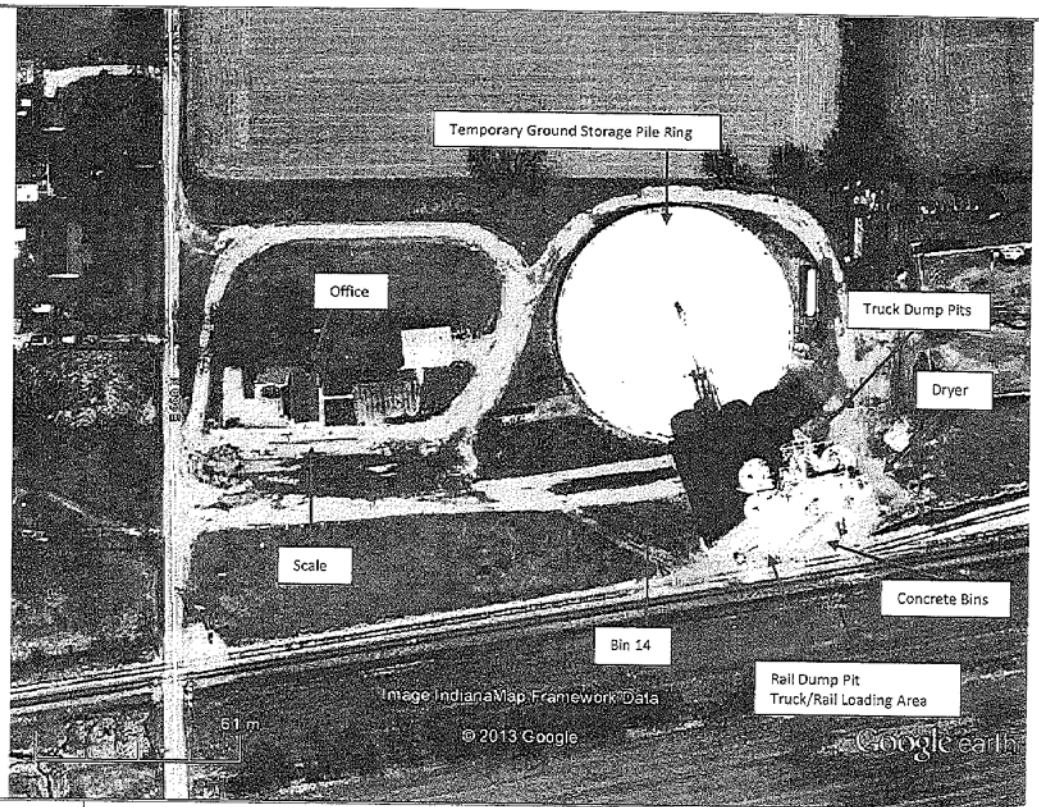
- According to Gavilon's Grain Housekeeping Plan, facility personnel conduct daily informal inspections of priority areas (no documentation required).

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

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

Gavilon Grain, LLC
Rushville, IN

GAVILON



Drawing Name:	Aerial Photo (from approximately 1998)	**Drawn By:**	Beth Pierson
		Revision Date:	09-26-2013

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Location:	**Gavilon Grain, LLC**
Source Location:	**866 North 600 East, Rushville, Indiana 46173**
County:	**Rush**
SIC Code:	**5153**
Permit No.:	**M139-33724-00021**
Permit Reviewer:	**Donald McQuigg**

On December 3, 2013, the Office of Air Quality (OAQ) had a notice published in the Rushville Republican, Rushville, Indiana, stating that Gavilon Grain, LLC had applied for a renewal of its Minor Source Operating Permit (MSOP) for the operation of a grain receiving, handling, drying, storage, and shipping facility. The notice also stated that the OAQ proposed to issue a MSOP for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On December 19, 2013, Gavilon Grain, LLC submitted the following comments to IDEM, OAQ on the draft MSOP.

IDEM, OAQ does not make any changes to the original TSD that was public noticed; however, the permit will include any updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:
Gavilon Grain, LLC requests to strike the indicated word in Permit Condition D.1.3(a) and in the Compliance Determination and Monitoring Requirements section in the Technical Support Document.

> *Daily visible emission notations of the grain receiving, handling, drying, and shipping facilities ~~exhaust~~ shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.*

Response to Comment 1:
IDEM, OAQ does not make any changes to the original Technical Support Document (TSD) after public notice; however, all changes are documented in this addendum to the TSD. The following change has been made to Condition D.1.3(a) in the permit:

D.1.3 Visible Emissions Notations

(a) Daily visible emission notations of the grain receiving, handling, drying, and shipping facilities ~~exhaust~~ shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

****

Comment 2:
Gavilon Grain, LLC respectfully does not agree with IDEM's classification of temporary ground storage ring (identified as Ring) as "permanent storage" as defined by New Source Performance Standard (NSPS) Subpart DD (40 CFR 60.301(d)) and any Subpart DD requirements that follow as a result of such classification. Such classification is contrary to IDEM's classification of the temporary ground storage pile, as not falling within the definition of "permanent storage" as defined under Subpart DD, in the facility's 2008 permit. Further, Gavilon Grain, LLC does not agree with the Memorandum dated November 21, 2007 from Michael S. Alushin, Director, Compliance Assessment and Media Programs Division, Office of Compliance, United States Environmental Protection Agency (USEPA), to Kendall Keith, President, National Grain and Feed Association, which we understand is the basis for IDEM's classification of the facility's temporary ground storage pile as "permanent storage". This Memorandum is not a regulation or requirement under Subpart DD (in fact, USEPA acknowledges this is not final agency action) or under IDEM's rules and regulations. Further, an industry coalition (of which Gavilon Grain, LLC is a member) has requested that USEPA rescind this Memorandum, and it is Gavilon's belief that USEPA will rescind this Memorandum.

Response to Comment 2:
As indicated in the November 21, 2007 memorandum from Michael S. Alushin, Director, Compliance Assessment and Media Programs Division, Office of Compliance, United States Environmental Protection Agency (U.S. EPA), to Kendall Keith, President, National Grain and Feed Association, a storage system may be considered as a "bin" under NSPS Subpart DD and included as part of the "permanent storage capacity" of the grain elevator if the storage system is designed with permanent structural features such as asphalt or concrete foundations, rigid sidewalls, long-lasting tarp covers, and permanent conveyor systems.

The temporary outdoor storage ring, identified as Ring, has a concrete foundation, is covered by tarpaulin, includes the use of rigid/removable sidewalls, and utilizes fixed conveyors. Therefore, when determining whether Subpart DD applies, the source must include the grain storage capacity of Ring.

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

No changes have been made to the permit or technical support document as a result of this comment.

Comment 3:
In the Technical Support Document on page 9, the date of the Fugitive Dust Control Plan should be September 26, 2013 instead of October 17, 2008.

Response to Comment 3:
IDEM, OAQ does not make any changes to the original Technical Support Document (TSD) after public notice; however, all changes are documented in this addendum to the TSD. No changes have been made to the permit or technical support document as a result of this comment.

Comment 4:
Gavilon Grain, LLC requests the following change to the table in the Technical Support Document on pages 9 and 10.

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (lbs/hr)	Maximum Process Weight (tons/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)
***	***	***	***	***
Wet Conveyor	~~3,500~~**5,000**	~~210,000~~**300,000**	~~105~~**150**	~~51.8~~**67.7**
***	***	***	***	***
Rail Dump Pit	10,000	600,000	300	~~76.2~~**63.0**

Response to Comment 4:
IDEM, OAQ does not make any changes to the original Technical Support Document (TSD) after public notice; however, all changes are documented in this addendum to the TSD. No changes have been made to the permit or technical support document as a result of this comment.

Comment 5:
In the Technical Support Document on page 10, the second paragraph states that the source uses enclosed conveying, socks, sleeves, and dump pit baffles to ensure compliance with 326 IAC 6-3-2 limits. This statement is not correct. For conveying and truck and rail loadout, controls are not required to stay below 326 IAC 6-3-2 limits. For grain receiving, a two-sided enclosure (i.e., drive through building) is used instead of pit baffles to comply with the 326 IAC 6-3-2 limits.

Response to Comment 5:

IDEM, OAQ does not make any changes to the original Technical Support Document (TSD) after public notice; however, all changes are documented in this addendum to the TSD. No changes have been made to the permit or technical support document as a result of this comment.

IDEM Contact

(a) Questions regarding this proposed MSOP can be directed to Donald McQuigg at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-4240 or toll free at 1-800-451-6027 extension 4-4240.

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

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Gavilon Grain, LLC
Source Location:	866 N 600 E, Rushville, Indiana, 46173
County:	Rush
SIC Code:	5153
Permit Renewal No.:	M139-33724-00021
Permit Reviewer:	Donald McQuigg

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Gavilon Grain, LLC relating to the operation of a stationary grain elevator for corn, wheat, and soybeans. On October 1, 2013, Gavilon Grain, LLC submitted an application to the OAQ requesting to renew its operating permit. Gavilon Grain, LLC was issued a New Source Construction and MSOP No. M139-28020-00021 on February 4, 2009.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) propane-fired grain dryer, identified as EU02, constructed in 1994, with a maximum capacity of 36.82 MMBtu/hr.

(b) One (1) grain storage silo, identified as Silo #1, with a maximum capacity of 82,752 bushels, constructed in 1982.

(c) One (1) grain storage silo, identified as Silo #2, with a maximum capacity of 82,752 bushels, constructed in 1982.

(d) One (1) grain storage silo, identified as Silo #3, with a maximum capacity of 6,017 bushels, constructed in 1982.

(e) One (1) grain storage silo, identified as Silo #4, with a maximum capacity of 14,945 bushels, constructed in 1982.

(f) One (1) grain storage silo, identified as Silo #5, with a maximum capacity of 9,711 bushels, constructed in 1982.

(g) One (1) grain storage silo, identified as Silo #6, with a maximum capacity of 9,711 bushels, constructed in 1982.

(h) One (1) grain storage silo, identified as Silo #7, with a maximum capacity of 19,409 bushels, constructed in 1982.

(i) One (1) grain storage silo, identified as Silo #8, with a maximum capacity of 83,398 bushels, constructed in 1982.

(j) One (1) grain storage silo, identified as Silo #9, with a maximum capacity of 80,489 bushels, constructed in 1982.

(k) One (1) grain storage silo, identified as Silo #10, with a maximum capacity of 10,946 bushels, constructed in 1982.

(l) One (1) grain storage silo, identified as Silo #11, with a maximum capacity of 20,706 bushels, constructed in 1982.

(m) One (1) grain storage silo, identified as Silo #12, with a maximum capacity of 83,398 bushels, constructed in 1982.

(n) One (1) grain storage silo, identified as Silo #13, with a maximum capacity of 83,398 bushels, constructed in 1982

(o) One (1) grain storage silo, identified as Silo #14, with a maximum capacity of 231,037 bushels, constructed in 2011.

(p) One (1) temporary storage ring, identified as Ring, with a maximum capacity of 799,000 bushels, constructed in 1992.

(q) Receiving, handling, and shipping equipment, including:

(1) East Leg, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(2) West Leg, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(3) Center Leg, with a maximum capacity of 17,500 bushels per hour, constructed in 1998;

(4) Receiving Conveyor, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(5) Top Fill, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(6) Draft Scale (Rail/Truck Loadout), with a maximum capacity of 40,000 bushels per hour (1,200 tons/hr) for rail loadout and a maximum capacity of 15,000 bushels per hour (450 tons/hr) for truck loadout, constructed in 1982;

(7) Center Reclaim Conveyor, with a maximum capacity of 30,000 bushels per hour, constructed in 2011;

(8) East Conveyor, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(9) Rail Receiving Conveyor, with a maximum capacity of 10,000 bushels per hour, constructed in 1982;

(10) Wet Conveyor, with a maximum capacity of 5,000 bushels per hour, constructed in 1994 and modified before 2007;

(11) Dry Conveyor, with a maximum capacity of 5,000 bushels per hour, constructed in 1994;

(12) Dryer, with a maximum capacity of 5,000 bushels per hour, constructed in 1994;

(13) Top Dry Fill Conveyor, with a maximum capacity of 5,000 bushels per hour, constructed in 1982;

(14) Dry Leg, with a maximum capacity of 5,000 bushels per hour, constructed in 1982;

(15) Wet Leg, with a maximum capacity of 5,000 bushels per hour, constructed in 1994;

(16) Pad Conveyor North, with a maximum capacity of 15,000 bushels per hour, constructed in 1991;

(17) Pad Conveyor South, with a maximum capacity of 15,000 bushels per hour, constructed in 1991;

(18) East Distributor, with a maximum capacity of 15,000 bushels per hour, constructed in 1982;

(19) Double Distributor, with a maximum capacity of 30,000 bushels per hour, constructed in 1982;

(20) Bin 14 Fill Belt Conveyor, totally enclosed, with a maximum capacity of 30,000 bushels per hour, constructed in 2011;

(21) Bin 14 Reclaim Drag Conveyor, totally enclosed, with a maximum capacity of 18,000 bushels per hour, constructed in 2011.

(22) One (1) side draw truck loadout spout, with a maximum loadout capacity of 15,000 bushels per hour (450 tons/hr), constructed in 2011.

(r) One (1) diesel fuel storage tank, with a storage capacity of 350 gallons, constructed in 2000.

(s) One (1) liquid propane storage tank, with a storage capacity of 1,000 gallons, constructed in 1997.

(t) One (1) liquid propane storage tank, with a storage capacity of 10,000 gallons, constructed in 1982.

(u) Fugitive emissions from paved and unpaved roads. [326 IAC 6-4]

Existing Approvals

Since the issuance of the MSOP M139-28020-00021 on February 4, 2009, the source has constructed or has been operating under the following additional approvals:

(a) Notice-Only-Change No. 139-28020-00021 issued on May 31, 2011.

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

Gavilon Grain, LLC proposes to add the following existing equipment to the equipment description list in the permit. This equipment existed at the time of the original permit issuance, but was inadvertently left out of the original equipment list. Updating the emission unit descriptive information contained in permit sections A.2 and D.1 to include these emission units does not affect the source's uncontrolled PTE or controlled PTE.

(1) One (1) truck dump pit, identified as North Truck Pit, with a maximum capacity of 15,000 bushels per hour (450 tons/hr), located inside a drive through two-sided enclosure, constructed in 1982, with emissions exhausted to the atmosphere;

(2) One (1) truck dump pit, identified as South Truck Pit, with a maximum capacity of 25,000 bushels per hour (750 tons/hr), located inside a drive through two-sided enclosure, constructed in 1982, with emissions exhausted to the atmosphere;

(3) One (1) rail dump pit, identified as Rail Pit, with a maximum capacity of 10,000 bushels per hour (300 tons/hr), constructed in 1982, with emissions to the atmosphere;

(4) Four (4) side draw loadout spouts, each with a maximum loadout capacity of 15,000 bushels per hour (450 tons/hr), constructed in 1982.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Rush County.

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

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

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Rush County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Rush County has been classified as attainment for $PM_{2.5}$. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(e) Other Criteria Pollutants
Rush 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

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

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Note: Although the New Source Performance Standard (NSPS) for Grain Elevators (40 CFR 60, Subpart DD) was promulgated on or before August 7, 1980, this facility does not fall within the "listed source category" for Subpart DD, since this grain elevator does not have a permanent storage capacity of more than 2.5 million bushels. The permanent storage capacity of the source is 1.62 million U.S. bushels.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	191.76
PM_{10}	66.20
$PM_{2.5}$	11.99
SO_2	2.64
VOC	1.76
CO	13.22
NO_x	22.91
GHG as CO_2e	22,531
Single HAP	0.024 (hexane)
Total HAP	0.025

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants, excluding GHG, is less than one hundred (100) tons per year. However, PM_{10} is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

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

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

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	GHG as CO_2e	Total HAPs	Worst Single HAP
Grain elevator (receiving, handling, storage, and shipping)	164.97	59.02	10.06	-	-	-	-	-	-	-
Propane-fired grain dryer	1.23	1.23	1.23	2.64	22.91	1.76	13.22	22,531	0.025	0.024 (hexane)
Storage pile wind erosion (fugitive)	0.70	0.35	0.14	-	-	-	-	-	-	-
Unpaved roads (fugitive***)	24.86	5.60	0.56	-	-	-	-	-	-	-
Total PTE of Entire Source	**191.76**	**66.20**	**11.99**	**2.64**	**22.91**	**1.76**	**13.22**	**22,531**	**0.025**	**0.024 (hexane)**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible
* Under the Part 70 Permit program (40 CFR 70), PM_{10} and $PM_{2.5}$, not particulate matter (PM), are each considered as a regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
***Mitigated PTE is taking natural mitigation due to precipitation into consideration.

(a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHG, are less than two hundred fifty (<250) tons per year and it is not in one (1) of the twenty-eight (28) listed source categories.

(b) GHG emissions are less than one hundred thousand (<100,000) tons of CO_2 equivalent (CO_2e) emissions per year.

Federal Rule Applicability

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD (326 IAC 12), are not included in the permit, since this grain elevator, as defined by 60.301(b), has a permanent storage capacity of less than 2.5 million bushes. The permanent storage capacity of the source is 1.62 million U.S. bushels. This source is also not considered a grain storage elevator as defined in 40 CFR 60.301(f) because it is not associated with any mill or oil extraction plant.

Note: Pursuant to NSPS Subpart DD, 40 CFR 60.301 (Definitions), "permanent storage capacity" means grain storage capacity which is inside a building, bin, or silo. As indicated in a memorandum (dated November 21, 2007) from Michael S. Alushin, Director, Compliance Assessment and Media Programs Division, Office of Compliance, United States Environmental Protection Agency (USEPA), to Kendall Keith, President, National Grain and Feed Association, a storage system may be considered as a "bin" under NSPS Subpart DD and included as part of the "permanent storage capacity" of the grain elevator if the storage system is designed with permanent structural features such as asphalt or concrete foundations, rigid sidewalls, long-lasting tarp covers, and permanent conveyor systems.

Based on information provided by the source, IDEM has determined that the ground pile is considered a "bin" under NSPS Subpart DD and is included in the "permanent storage capacity" of the grain elevator, since it has permanent structural features.

(b) The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for which construction, reconstruction, or modification commenced after June 11, 1973, and prior to May 19, 1978, 40 CFR 60, Subpart K (326 IAC 12), are not included in the permit, because all storage tanks located at the source have a storage capacity of less than 151,412 liters (40,000 gallons).

(c) The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984, 40 CFR 60, Subpart Ka (326 IAC 12), are not included in the permit because all storage tanks located at the source have a storage capacity of less than 151,412 liters (40,000 gallons).

(d) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (including petroleum liquid storage vessels) for which construction, reconstruction, or modification commenced after July 23, 1984, 40 CFR 60, Subpart Kb (326 IAC 12), are not included in the permit because all tanks located at the source have a design capacity of less than 75 m^3 (19,812.9 gallons).

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Organic Liquids Distribution, 40 CFR 63, Subpart EEEE (326 IAC 20), are not included in the permit, because this source is not a major source of HAP emissions.

(g) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (63. 11193 through 63.11237), are not included in the permit renewal, because the source does not contain boilers. This source only contains a propane-fired grain dryer.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDD are not included in this permit renewal, since this source is not considered a prepared feeds manufacturing facility as defined by 40 CFR 63.11627. This source does not manufacture animal feed. This source only consists of a grain elevator.

(i) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not one (1) of the twenty-eight (28) listed source categories, and the potential to emit (PTE) of all criteria pollutants is less than two hundred fifty (250) tons per year and the potential to emit greenhouse gas (GHG) is less than 100,000 tons of CO_2e per year. Therefore, this source is a minor source and 326 IAC 2-2 (PSD) does not apply.

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD applicability.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, 326 IAC 2-6 does not apply.

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

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the unpaved roads have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

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

The source is subject to the requirements of 326 IAC 6-5, because the unpaved roads have potential fugitive particulate emissions greater than twenty-five (25) tons per year. Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, submitted on October 17, 2008, which is included as Attachment A to the permit.

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Individual Facilities

Grain Elevator

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of the following operations shall not exceed the pound per hour limits listed in the table below, assuming 60 pounds per bushel:

The pounds per hour limitations were calculated using the following equation:

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:

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

Emissions Unit Description	Maximum (bushels/hr)	Maximum Process Weight (lbs/hr)	Maximum Process Weight (tons/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)
North Truck Dump Pit	15,000	900,000	450	67.7
South Truck Dump Pit	25,000	1,500,000	750	73.9
East Leg	15,000	900,000	450	67.7
West Leg	15,000	900,000	450	67.7
Center Leg	17,500	1,050,000	525	69.5
Receiving Conveyor	15,000	900,000	450	67.7
Top Fill Conveyor	15,000	900,000	450	67.7
Bin 14 Fill Belt Conveyor	30,000	1,800,000	900	76.2
Draft Scale - Rail Loadout	40,000	2,400,000	1200	80.0
Draft Scale - Truck Loadout	15,000	900,000	450	67.7
Center Reclaim Conveyor	15,000	900,000	450	67.7
East Reclaim Conveyor	15,000	900,000	450	67.7
Bin 14 Reclaim Drag Conveyor	18,000	1,080,000	540	69.9
Rail Receiving Conveyor	10,000	600,000	300	63.0
Wet Conveyor	3,500	210,000	105	51.8
Dry Conveyor	5,000	300,000	150	55.4
Dryer	5,000	300,000	150	55.4

Top Dry Fill Conveyor	5,000	300,000	150	55.4
Dry Leg	5,000	300,000	150	55.4
Wet Leg	5,000	300,000	150	55.4
Pad Conveyor North	15,000	900,000	450	67.7
Pad Conveyor South	15,000	900,000	450	67.7
East Distributor	15,000	900,000	450	67.7
Double Distributor	30,000	1,800,000	900	76.2
Rail Dump Pit	10,000	600,000	300	76.2
Truck Loadout - Side Draw	15,000	900,000	450	67.7

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

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

Grain Dryer (Propane Combustion)

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

The propane-fired grain dryer is not subject to the requirements of 326 IAC 6-2, because it is not an indirect heating unit.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the propane-fired grain dryer is not subject to the requirements of 326 IAC 7-1.1, since it has unlimited sulfur dioxide (SO_2) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

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

The propane-fired grain dryer is not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

Diesel Storage Tank

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

The diesel storage tank is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions is less than twenty-five (25) tons per year.

326 IAC 8-4-3 (Petroleum Sources; Petroleum Liquid Storage Facilities)

Pursuant to 326 IAC 8-4-1(c) and 326 IAC 8-4-3(a), the storage vessel at this source is not subject to the requirements of 326 IAC 8-4-3, since the diesel fuel storage tank (installed in 1998, 500 gallon capacity), which was constructed after January 1, 1980, has a storage capacity less than thirty-nine thousand (39,000) gallons and stores diesel fuel which has a true vapor pressure less than 1.52 psi at the storage temperature.

326 IAC 8-4-6 (Petroleum Sources: Gasoline Dispensing Facilities)

The diesel fuel dispensing facilities at this source are not subject to the requirements 326 IAC 8-4-6, since the diesel fuel dispensing facilities are not considered gasoline dispensing facilities as defined by 326 IAC 8-4-6(a)(8).

326 IAC 8-6 (VOC Rules: Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1, this rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of one hundred (100) tons per year or more, and not regulated by any other provision of Article 8. Pursuant to 326 IAC 8-6-1, this source is not subject to the requirements 326 IAC 8-6, because this source, which is located in Rush County, did not commence operation after October 7, 1974 and prior to January 1, 1980, and does not have potential VOC emissions of 100 tons per year or more.

326 IAC 8-7 (VOC Rules; Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

Pursuant to 326 IAC 8-7-2(a), this source is not subject to the requirements of 326 IAC 8-7, since it is not located in Lake, Porter, Clark, or Floyd County.

326 IAC 8-9 (VOC Rules; Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1(a), this source is not subject to the requirements of 326 IAC 8-9, since it is not located in Lake, Porter, Clark, or Floyd County.

There are no other 326 IAC 8 Rules that are applicable to the diesel storage tank at this source.

Compliance Determination and Monitoring Requirements

The compliance monitoring requirements applicable to this source are as follows:

(a) Daily visible emission notations of the grain receiving, handling, drying, and shipping facilities exhaust shall be performed during normal daylight. 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 reasonable response steps. Section C - Response to Excursions or 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.

Recommendation

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

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

An application for the purposes of this review was received on October 1, 2013.

Conclusion

The operation of this stationary grain elevator for corn, wheat, and soybeans shall be subject to the conditions of the attached MSOP Renewal No. M139-33724-00021.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Donald McQuigg at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-4240 or toll free at 1-800-451-6027 extension 4-4240.

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

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

TSD Appendix A: Emissions Calculations

Company Name: Gavilon Grain, LLC
Address City IN Zip: 866 N 600 E, Rushville, IN 46173
Permit Number: M139-33724-00021
Reviewer: Donald McQuigg
Date: October 29, 2013

	Unlimited/Uncontrolled Potential to Emit (tons/year)*										
Process description	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	VOC	CO	GHG as CO2e	Total HAPs	Worst Single HAP	
Non-Fugitive Emissions*											
Grain Elevator (grain receiving, handling, storage and shipping)	164.97	59.02	10.06	-	-	-	-	-	-	-	-
Propane Gas-Fired Grain Dryer	1.23	1.23	1.23	2.64	22.91	1.76	13.22	22,531	0.025	0.024	(hexane)
Total Non-Fugitive Emissions**	**166.20**	**60.25**	**11.29**	**2.64**	**22.91**	**1.76**	**13.22**	**22,531**	**0.025**	**0.024**	**(hexane)**
Fugitive Emissions**											
Ground Storage Pile Wind Erosion (fugitive)	0.70	0.35	0.14	-	-	-	-	-	-	-	-
Unpaved Roads***	24.86	5.60	0.56	-	-	-	-	-	-	-	-
Total Fugitive Emissions**	**25.56**	**5.95**	**0.70**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**-**
Total Non-Fugitive and Fugitive Emissions**	**191.76**	**66.20**	**11.99**	**2.64**	**22.91**	**1.76**	**13.22**	**22,531**	**0.025**	**0.024**	**(hexane)**

Notes

*Potential to Emit (PTE) is based on the maximum grain received for the previous five (5) years times an adjustment factor of 1.2.

**Since this type of operation is not one (1) 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. The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

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

Appendix A: Emission Calculations
Revised Maximum Throughput from 2007 - 2012 Throughput Data

Company Name: Gavilon Grain, LLC
Address City IN Zip: 866 N 600 E, Rushville, IN 46173
Permit Number: M139-33724-00021
Reviewer: Donald McQuigg
Date: October 29, 2013

Based on facility information compiled since permit issuance in 2008, Gavilon proposes different maximum throughput assumptions to use to calculate PTE.

ASSUMPTIONS USED TO CALCULATE CONTROLLED PTE DURING PAST PERMITTING ACTION (2008)	PROPOSED ASSUMPTIONS TO USE TO CALCULATE CONTROLLED PTE (2013)	HISTORICAL DATA

THROUGHPUT		THROUGHPUT		THROUGHPUT				
					External Receipts from Farm	External Shipments to Customers		
MAX (bushels/year)	PTE = MAX * 1.2 (bushels/year)	MAX (bushels/year)	PTE = MAX * 1.2 (bushels/year)	Year	Inbound Elevator (bushels/year)	Outbound Elevator Rail (bushels/year)	Outbound Elevator Truck (bushels/year)	Average Throughput (bushels/year)
7,355,786	8,826,943	7,241,442	8,689,730	2007	6,940,307	6,078,817	735,287	6,877,206
		plus maximum internal transfer of		2008	7,200,622	6,621,052	661,209	7,241,442
20,000,000 bushels per year		800,000 bushels/year		2009	6,403,432	4,903,981	1,883,321	6,595,367
used for emissions calculations		emissions calculations based on:		2010	6,141,517	4,712,979	1,347,493	6,100,995
		15,000,000 bushels/year		2011	5,269,551	2,566,320	2,805,960	5,320,916
		(or approximately double the highest		2012	5,831,861	1,783,640	3,125,493	5,370,497
		throughput of last 5 years)						

RECEIPTS		RECEIPTS		RECEIPTS		
Straight Truck (%)	Hopper Bottom Truck (%)	Straight Truck (%)	Hopper Bottom Truck (%)	Year	Straight Truck (%)	Hopper Bottom Truck (%)
15%	85%	100%	0%	2007	26%	74%
				2008	25%	75%
				2009	26%	74%
				2010	27%	73%
				2011	27%	73%
				2012	25%	75%
				* Using 530 bushels per truck as straight truck cut-off		

SHIPMENTS		SHIPMENTS		SHIPMENTS				
Rail Outbound (%)	Truck Outbound (%)	Rail Outbound (%)	Truck Outbound (%)	Year	Rail Outbound (bushels/year)	Truck Outbound (bushels/year)	Rail Outbound (%)	Truck Outbound (%)
90%	10%	0%	100%	2007	6,078,817	735,287	89%	11%
				2008	6,621,052	661,209	91%	9%
				2009	4,903,981	1,883,321	72%	28%
				2010	4,712,979	1,347,493	78%	22%
				2011	2,566,320	2,805,960	48%	52%
				2012	1,783,640	3,125,493	36%	64%

DRIED	DRIED
Inbound (%)	Inbound (%)
11%	100%

Appendix A: Emission Calculations
Unlimited PM Emissions from the Grain Handling, Storage and Drying Processes
using Revised Maximum Throughput from 2007 - 2012 Throughput Data

Company Name: Gavilon Grain, LLC
Address City IN Zip: 866 N 600 E, Rushville, IN 46173
Permit Number: M139-33724-00021
Reviewer: Donald McQuigg
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Maximum Grain Received from Farm (bushels of grain handled per year) =	15,000,000	To be conservative, selected throughput that is approximately double the highest throughput during the past 5 years.
Capacity of Temporary Storage Pile (bushels/year) =	800,000	
Weight of grain (lbs/bushel) =	60	
Maximum Grain Received from Farm (tons of grain handled per year) =	450,000	
Capacity of Temporary Storage Pile (bushels/year) =	24,000	
Maximum Number of Times Storage Pile is Filled per Year =	1	
Grain Received from Trucks at Dump Pits (tons/year) =	474,000	Grain received from farm plus grain received at elevator (internal transfer) from temporary ground storage piles
Grain Shipped (tons/year) =	474,000	Grain shipped from elevator plus grain shipped (internal transfer) from temporary storage pile

Conveying or Headhouse/Internal Handling

Number of Steps =	3	Conservative estimate of the number of times grain is elevated (placed into storage after
Throughput for Conveying or Headhouse/Internal Handling (tons/year) =	1,350,000	receipt, after drying or repositioning and prior to loadout).
	2	Conservative estimate of the number of times grain is placed into storage (after receipt and
Amount grain placed into storage bins (tons/year)=	900,000	after drying or repositioning).

Assumptions for Potential Emissions (Worst Case Scenarios)

Straight Truck Receipts	100%	(highest emission factor)
Hopper Bottom Truck Receipts	0%	
Grain Dried	100%	
Truck Shipments	100%	(highest emission factor)
Rail Shipments	0%	

	Unloading / Receiving						Drying			Headhouse and Handling			Storage Bin Vent			Shipping					
	Straight Truck			Hopper Bottom Truck			Column Dryer			Legs, Conveyors, etc.						Railcar			Truck		
	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$
Emission Factor in lbs/ton	0.18	0.059	0.010	0.035	0.0078	0.0013	0.22	0.055	0.0094	0.061	0.034	0.0058	0.025	0.0063	0.0011	0.027	0.0022	0.00037	0.086	0.029	0.0049
Potential Emissions in tons/year	42.66	13.98	2.37	0.00	0.00	0.00	49.50	12.38	2.12	41.18	22.95	3.92	11.25	2.84	0.50	0.00	0.00	0.00	20.38	6.87	1.16
Controls (overall % efficiency)	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Controlled Potential Emissions in tons/year	42.66	13.98	2.37	0.00	0.00	0.00	49.50	12.38	2.12	41.18	22.95	3.92	11.25	2.84	0.50	0.00	0.00	0.00	20.38	6.87	1.16

Emission factors from AP-42 Table 9.9.1 Particulate Emission Factors for Grain Elevators (update 2003).

	PM	PM_{10}	$PM_{2.5}$
Total Uncontrolled Emissions (tons/year)	164.97	59.02	10.06
Total Controlled Emissions (tons/year)	164.97	59.02	10.06

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

Company Name: Gavilon Grain, LLC
Address City IN Zip: 866 N 600 E, Rushville, IN 46173
Permit Number: M139-33724-00021
Reviewer: Donald McQuigg
Date: October 29, 2013

Processes	Maximum Throughput or Process Weight Rate [1]		PM Emission Factors [2]	Controls	Collection and Control Efficiency	PM Emissions Before Control	Allowable PM Emissions Rate [3]	PM Emissions After Control
	(bushels/hour)	(tons/hour)	(lbs/ton)		(%)	(lbs/hour)	(lbs/hour)	(lbs/hour)
North Truck Dump Pit	15,000	450	0.18	Located inside Two-Sided Enclosure	50%	81.0	67.7	40.5
South Truck Dump Pit	25,000	750	0.18	Located inside Two-Sided Enclosure	50%	135.0	73.9	67.5
Rail Dump Pit	10,000	300	0.032	None		9.6	63.0	9.6
Receiving Conveyor	15,000	450	0.061	Enclosed		27.5	67.7	27.5
Rail Receiving Conveyor	10,000	300	0.061	Enclosed		18.3	63.0	18.3
East Leg	15,000	450	0.061	Enclosed		27.5	67.7	27.5
West Leg	15,000	450	0.061	Enclosed		27.5	67.7	27.5
Center Leg	17,500	525	0.061	Enclosed		32.0	69.5	32.0
East Distributor	15,000	450	0.061	Enclosed		27.5	67.7	27.5
Double Distributor	30,000	900	0.061	Enclosed		54.9	76.2	54.9
Top Fill Conveyor	15,000	450	0.061	Enclosed		27.5	67.7	27.5
Bin 14 Fill Belt Conveyor	30,000	900	0.061	Enclosed		54.9	76.2	54.9
Bin 1	32,500	975	0.025	None		24.4	77.3	24.4
Bin 2	32,500	975	0.025	None		24.4	77.3	24.4
Bin 3	32,500	975	0.025	None		24.4	77.3	24.4
Bin 4	32,500	975	0.025	None		24.4	77.3	24.4
Bin 5	32,500	975	0.025	None		24.4	77.3	24.4
Bin 6	32,500	975	0.025	None		24.4	77.3	24.4
Bin 7	32,500	975	0.025	None		24.4	77.3	24.4
Bin 8	32,500	975	0.025	None		24.4	77.3	24.4
Bin 9	32,500	975	0.025	None		24.4	77.3	24.4
Bin 10	40,000	1,200	0.025	None		30.0	80.0	30.0
Bin 11	15,000	450	0.025	None		11.3	67.7	11.3
Bin 12	15,000	450	0.025	None		11.3	67.7	11.3
Bin 13	15,000	450	0.025	None		11.3	67.7	11.3
Bin 14	30,000	900	0.025	None		22.5	76.2	22.5
Center Reclaim Conveyor	30,000	900	0.061	Enclosed		54.9	76.2	54.9
East Reclaim Conveyor	15,000	450	0.061	Enclosed		27.5	67.7	27.5
Bin 14 Reclaim Drag Conveyor	18,000	540	0.061	Enclosed		32.9	69.9	32.9
Wet Conveyor	5,000	150	0.061	Enclosed		9.2	55.4	9.2
Wet Leg	5,000	150	0.061	Enclosed		9.2	55.4	9.2
Dryer	5,000	150	0.22	External Sheeting Perforation Size		33.0	55.4	33.0
Dry Conveyor	5,000	150	0.061	Enclosed		9.2	55.4	9.2
Dry Leg	5,000	150	0.061	Enclosed		9.2	55.4	9.2
Top Dry Fill Conveyor	5,000	150	0.061	Enclosed		9.2	55.4	9.2
Pad Conveyor North	15,000	450	0.061	Enclosed		27.5	67.7	27.5
Pad Conveyor South	15,000	450	0.061	Enclosed		27.5	67.7	27.5
Temporary Ground Storage Pile Ring (XT1)	15,000	450	0.025	None		11.3	67.7	11.3
Draft Scale - Rail Loadout	40,000	1,200	0.027	None		32.4	80.0	32.4
Draft Scale - Truck Loadout	15,000	450	0.086	None		38.7	67.7	38.7
Truck Loadout at Elevator	15,000	450	0.086	None		38.7	67.7	38.7
Truck Loadout - Side Draw	15,000	450	0.086	None		38.7	67.7	38.7
Truck Loadout at Pile	17,500	525	0.086	None		45.2	69.5	45.2

Note 1. The maximum grain processing rates, as listed in the permit, are used to represent the process weight rates for each emission segment. For the storage bins, the maximum fill rate was used.
Note 2. Emission factor source is AP-42, Section 9.9.1, Table 9.9.1-1 Particulate Emission Factors for Grain Elevators, March 2003.
Note 3. According to 326 IAC 6-3-2, the allowable particulate matter (PM) emissions rate in pounds per hour (lbs/hour) is determined using the following equations:

Equation 1 (for P < 60,000 or = 60,000 lbs/hour, which is < 30 or = 30 tons/hour) $E = 4.10 * P^{0.67}$

Equation 2 (For P > 60,000 lbs/hour, which is > 30 tons/hour) $E = 55.0 * P^{0.11} - 40$

Where:
E = allowable particulate matter (PM) emissions rate in pounds per hour (lbs/hour)
P = process weight rate in tons per hour

Methodology:
Maximum grain throughput (tons/hour) = maximum grain throughput (bushels/hour) * 60 pounds/bushel * 1 ton/2000 pounds
PTE of PM before control (pounds/hour) = maximum grain throughput (tons/hour) * emission factor (pounds PM/ton)
PTE of PM after control (pounds/hour) = maximum grain throughput (tons/hour) * emission factor (pounds PM/ton) * (1 - control efficiency(%))

Appendix A: Emission Calculations
Maximum Permanent Storage Capacity (bushels)

Company Name: Gavilon Grain, LLC
Address City IN Zip: 866 N 600 E, Rushville, IN 46173
Permit Number: M139-33724-00021
Reviewer: Donald McQuigg
Date: October 29, 2013

Maximum Permanent Storage Capacity (bushels) for NSPS Subpart DD Applicability

Unit	Maximum Storage Capacity (bushels)
Silo #1	82,752
Silo #2	82,752
Silo #3	6,017
Silo #4	14,945
Silo #5	9,711
Silo #6	9,711
Silo #7	19,409
Silo #8	83,398
Silo #9	80,489
Silo #10	10,946
Silo #11	20,706
Silo #12	83,398
Silo #13	83,398
Silo #14	231,037
Storage Ring *	799,000
Total	**1,617,669**

*Note: Pursuant to NSPS Subpart DD, 40 CFR 60.301 (Definitions), "permanent storage capacity" means grain storage capacity which is inside a building, bin, or silo. The storage capacity of the storage ring is considered a bin and is included in the "permanent storage capacity" of the grain elevator.

Appendix A: Emission Calculations
Grain Dryer Emissions: Propane Combustion

Company Name: Gavilon Grain, LLC
Address City IN Zip: 866 N 600 E, Rushville, IN 46173
Permit Number: M139-33724-00021
Reviewer: Donald McQuigg
Date: October 29, 2013

Heat Input Capacity MMBtu/hr	Potential Throughput Mgals/year Mgal/year
36.82	3,525

SO2 Emission factor (lbs/Mgal) = 0.10 x S
Where S = sulfur content expressed in gr/100 cubic feet of gas vapor
15 grains/100 scf

Sulfur concentration based on Gas Processors Association Engineering Data Book (Ninth Edition, 1972), Figure 15-50 (GPA Liquefied Petroleum Gas Specifications, rev. 1979), Commercial Propane = 15 gr/100 scf, HD-5 Propane = 10 gr/100 scf (both as S).

1.5 lbs SO2/Mgal propane

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/Mgal	0.7	0.7	0.7	1.5	13.0	1.0	7.5
Potential Emission in tons/yr	1.23	1.23	1.23	2.64	22.91	1.76	13.22

* Emission factors are filterable and condensable combined.

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
Mgal = 1,000 gallons
Emission Factors are from AP 42, Chapter 1.5, Tables 1.5-1 for SCC 1-02-010-02 (July 2008)
Potential Throughput (Mgal) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 Mgal/91.5 MMBtu
Emission (tons/yr) = Throughput (Mgal/yr) x Emission Factor (lb/Mgal)/2,000 lb/ton

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Emission Factor in lb/Mgal	1.6E-05	9.0E-06	5.6E-04	1.3E-02	2.5E-05	
Potential Emission in tons/yr	2.769E-05	1.582E-05	9.888E-04	2.373E-02	4.482E-05	**2.481E-02**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Emission Factor in lb/Mgal	3.7E-06	8.2E-06	1.0E-05	2.8E-06	1.6E-05	
Potential Emission in tons/yr	6.592E-06	1.450E-05	1.846E-05	5.010E-06	2.769E-05	**7.225E-05**
					Total HAPs	**0.025**
					Worst HAP	**0.024**

AP-42 does not list emission factors for HAPs resulting from combustion of propane.
It was assumed that HAP emissions from natural gas are similar to those from propane.
The five highest organic and metal HAPs emission factors from AP-42 Section 1.4 Tables 1.4-2, 1.4-3 and 1.4-4 (July 1998) are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Emission factors for organic and metal HAPs were converted from lbs/MMcf to lbs/Mgal.

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/Mgal	12,500	0.2	0.9
Potential Emission in tons/yr	22,032	0.4	1.6
Summed Potential Emissions in tons/yr	22,034		
CO2e Total in tons/yr	22,531		

Methodology
Emission Factors are from AP 42, Chapter 1.5, Tables 1.5-1 for SCC 1-02-010-02 (July 2008)
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (Mgal/yr) x Emission Factor (lb/Mgal)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Gavilon Grain, LLC
Address City IN Zip: 866 N 600 E, Rushville, IN 46173
Permit Number: M139-33724-00021
Reviewer: Donald McQuigg
Date: October 29, 2013

The following calculations determine the amount of emissions created by unpaved roads, based on maximum throughput and AP-42, Ch 13.2.2 (12/2003).

Vehicle Miles Traveled (VMT) = (Potential tons hauled / average vehicle weight in tons) x length of road traveled (miles)

	Potential Throughput		
Receipts from Farm =	450,000	(tons/year)	
Shipments to Off-Site Customers =	450,000	(tons/year)	
Internal Transfers (capacity of storage pile) =	24,000	(tons/year)	
Grain Receipt or Shipment Conservative Haul Road Length - Round Trip	0.50	miles	Haul road route - Enter property from N 600 E from the east and drive northeast of office and loop back to the south and west and drive west over the scale (located south of the office) for an inbound weight, make a u-turn and head east to concrete elevator and unload or load, drive east and north and loop around ground pile storage ring counterclockwise and then drive west over scale for an outbound weight and exit property to the west.
Internal Transfer from Pile to Elevator Conservative Haul Road Length - Round Trip	0.28	miles	Haul road route - Load at pile, exit pile from southeast corner, drive counterclockwise around ground pile storage ring back to elevator to unload and enter pile at southwest corner.
Empty Vehicle Weight (tons)	15		
Full Vehicle Weight (tons)	40		
Average Vehicle Weight (tons)	27.5		
	16,364	VMT/year	Receipts from Farm and Shipments to Off-Site Customers
	244	VMT/year	Internal Transfers
	16,608	VMT/year	

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

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

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

	PM	PM_{10}	$PM_{2.5}$	
Unmitigated Emission Factor, Ef =	4.55	1.03	0.10	lb/VMT
Mitigated Emission Factor, Eext =	2.99	0.67	0.07	lb/VMT
Dust Control Efficiency =	50%	50%	50%	Dust control efficiency, pursuant to dust control measures outlined in fugitive dust control plan included as Attachment A.

	Unmitigated PTE of PM (tons/year)	Unmitigated PTE of PM_{10} (tons/year)	Unmitigated PTE of $PM_{2.5}$ (tons/year)	Mitigated PTE of PM (tons/year)	Mitigated PTE of PM_{10} (tons/year)	Mitigated PTE of $PM_{2.5}$ (tons/year)	Controlled PTE of PM (tons/year)	Controlled PTE of PM_{10} (tons/year)	Controlled PTE of $PM_{2.5}$ (tons/year)
Maximum Annual Haul Road Emissions	**37.80**	**8.52**	**0.85**	**24.86**	**5.60**	**0.56**	**12.43**	**2.80**	**0.28**

Methodology
Vehicle Miles Traveled (VMT) = (Potential tons hauled / average vehicle weight in tons) x length of road traveled (miles)
Unmitigated PTE (tons/yr) = (VMT/yr) * (Unmitigated Emission Factor (lb/VMT)) * (ton/2000 lbs)
Mitigated PTE (tons/yr) = (VMT/yr) * (Mitigated Emission Factor (lb/VMT)) * (ton/2000 lbs)
Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)
The mean % silt content of unpaved roads is from the EPA website http://www.epa.gov/ttn/chief/ap42/ch13/related/c13s02-2.html

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

Appendix A: Emission Calculations
Fugitive Dust Emissions - Storage Pile Wind Erosion

Company Name: Gavilon Grain, LLC
Address City IN Zip: 866 N 600 E, Rushville, IN 46173
Permit Number: M139-33724-00021
Reviewer: Donald McQuigg
Date: October 29, 2013

Potential to Emit
Storage Pile Wind Erosion

1. Storage Pile Area

Diameter (feet) =	227
Area (feet^2) =	40,450
Conversion Factor (feet^2/acre) =	43,560
Storage Pile Area (acres) =	0.93

2. Storage Pile Wind Erosion Emission Factor

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

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

Particle Size Multiplier PM =	1	From "Air Pollution Engineering Manual" by the Air and Waste Management Association, Edited by Anthony J. Buonicore and Wayne T. Davis, Van Nostrand Reinhold, New York, 1992, Section 4, page 136.
Particle Size Multiplier PM_{10} =	0.5	
Particle Size Multiplier $PM_{2.5}$ =	0.2	
Silt Content (s) =	2	Based on United States Department of Agriculture Foreign Matter limit for U.S. Number 1 grade grain for corn (7 CFR 810.404).
Number of Wet Days (p) =	120	From AP-42, Chapter 13, Section 13.2.1 Paved Roads, Figure 13.2.1-2. Mean number of days with 0.01 inch or more of precipitation (January 2011).
Unobstructed Wind Speed (%) (f) =	26.2	Percent of the time the unobstructed wind speed exceeds 12 miles per hour based on the Indianapolis International Airport (i.e. the closest meteorological station) data obtained from the SCRAM Surface Meteorological Archived Data 1984 to 1992 (http://www.epa.gov/scram001/surfacemetdata.htm).
Number of Days Pile is Uncovered =	365	Worst case estimate

	PM	PM_{10}	$PM_{2.5}$	
Storage Pile Wind Erosion Emission Factor =	4.13	2.06	0.83	lb/acre/day

3. Wind Erosion Emissions from Storage Piles

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

	PTE PM (tons/year)	PTE PM_{10} (tons/year)	PTE $PM_{2.5}$ (tons/year)
Maximum Annual Wind Erosion Emissions	0.70	0.35	0.14

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

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Beth Pierson
Gavilon Grain, LLC
11 ConAgra Drive
Omaha, NE 68102

DATE: January 30, 2014

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

SUBJECT: Final Decision
Minor Source Operating Permit (MSOP) Renewal
139-33724-00021

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Brian Carleton, VP - Ops
OAQ Permits Branch Interested Parties List

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

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

January 30, 2014

TO: Rushville Public Library

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

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

Applicant Name: Gavilon Grain, LLC
Permit Number: 139-33724-00021

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 1/30/2014 Gavilon Grain, LLC 139-33724-00021 FINAL		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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2		Brian Carleton VP - Ops Gavilon Grain, LLC 11 ConAgra Dr Omaha NE 68102 *(RO CAATS)*									
3		Rush County Commissioners 101 East Second Street Rushville IN 46173 *(Local Official)*									
4		Rush County Health Department Courthouse, Room 5 Rushville IN 46173-1854 *(Health Department)*									
5		Rushville Public Library 130 W 3rd St Rushville IN 46173-1899 *(Library)*									
6		Rushville Town Council 133 W. First St. Rushville IN 46173 *(Local Official)*									
7		Mrs. Bonnie Miller P.O. Box 15 Falmouth IN 46127 *(Affected Party)*									
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