



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

Date: September 9, 2014

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

Source Name: Consolidated Grain and Barge Co.

Permit Level: Minor Source Operating Permit (MSOP)

Permit Number: 077-34597-00017

Source Location: 215 Marina Street, Madison, Indiana

Type of Action Taken: Initial Permit

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 matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34597.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

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.

(continues on next page)

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.



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

Minor Source Operating Permit OFFICE OF AIR QUALITY

**Consolidated Grain and Barge Co.
215 Marina Street
Madison, Indiana 47250**

(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.: M077-34597-00017 | |
| Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality | Issuance Date: September 9, 2014 Expiration Date: September 9, 2019 |

TABLE OF CONTENTS

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| B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5] | |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

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

- C.15 Malfunctions Report [326 IAC 1-6-2]
- C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]
[IC 13-14-1-13]

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 16

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

- D.1.1 Particulate [326 IAC 6-3-2]
- D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

- D.1.3 Visible Emissions Notations

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

- D.1.4 Record Keeping Requirement

Annual Notification 18
Malfunction Report 19

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 terminal export elevator.

| | |
|------------------------------|---|
| Source Address: | 215 Marina Street, Madison, Indiana 47250 |
| General Source Phone Number: | (812) 579-5231 |
| SIC Code: | 5153 |
| County Location: | Jefferson (Madison Township) |
| Source Location Status: | Nonattainment for PM _{2.5} standard Attainment for all other 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) over-head covered grain dump shed, with side enclosures, containing one (1) dump pit (Pit # 1), with a maximum capacity of 420 tons per hour;
- (b) One (1) telescoping barge loading spout, with a maximum capacity of 420 tons per hour; and
- (c) One (1) covered barge loading belt conveyor, with a maximum capacity of 420 tons per hour.
- (d) Fugitive emissions from 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, M077-34597-00017, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. 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) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M077-34597-00017 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) over-head covered grain dump shed, with side enclosures, containing one (1) dump pit (Pit # 1), with a maximum capacity of 420 tons per hour;
- (b) One (1) telescoping barge loading spout, with a maximum capacity of 420 tons per hour; and
- (c) One (1) covered barge loading belt conveyor, with a maximum capacity of 420 tons per hour.
- (d) Fugitive emissions from 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:

$$E = 55.0P^{0.11} - 40 \quad \text{where } E = \text{rate of emissions in pounds per hour; and}$$

$$P = \text{process weight rate in tons per hour}$$

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

| Emissions Unit Description | Maximum Process Weight (tons/hr) | 326 IAC 6-3-2 Allowable PM Emissions (lbs/hr) |
|-----------------------------|----------------------------------|---|
| Truck Dump Pit | 420 | 66.9 |
| Barge loading spout | 420 | 66.9 |
| Barge loading belt conveyor | 420 | 66.9 |

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

D.1.4 Record Keeping Requirement

- (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: | Consolidated Grain and Barge Co. |
| Address: | 215 Marina Street |
| City: | Madison, Indiana 47250 |
| Phone #: | (812) 579-5231 |
| MSOP #: | M077-34597-00017 |

I hereby certify that Consolidated Grain and Barge Co. is : still in operation.
 no longer in operation.
I hereby certify that Consolidated Grain and Barge Co. is : in compliance with the requirements of MSOP M077-34597-00017.
 not in compliance with the requirements of MSOP M077-34597-00017.

| |
|---------------------------------------|
| 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. M077-34597-00017

Consolidated Grain and Barge Co.
215 Marina Street, Madison, Indiana 47250

Fugitive Dust Control Plan
Consolidated Grain and Barge
Madison, Indiana

Standard operating procedures and controls are in place to contain fugitive dust to facility property. Those procedures and controls are described below for the various transfer points.

During barge loading the spout will be placed in the barge cover opening to reduce the distance the grain falls before entering the barge to limit fugitive dust. Dust that falls out on the covers of the barge will be swept up as needed and placed in the barge upon completion of loading.

The conveyors at the facility have covers which help limit dust emissions from the facility. These covers are kept in place at all times and replaced if needed.

Dust generated by trucks operating on gravel roadways will be controlled on an as needed schedule with the application of water spray. The paved roadway surfaces will be swept manually.

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

Technical Support Document (TSD) for a SSOA Transitioning to a Minor
Source Operating Permit (MSOP)

Source Description and Location

| | |
|------------------------------|--|
| Source Name: | Consolidated Grain and Barge Co. |
| Source Location: | 215 Marina Street, Madison, Indiana 47250 |
| County: | Jefferson (Madison Township) |
| SIC Code: | 5153 |
| Operation Permit No.: | M077-34597-00017 |
| Permit Reviewer: | Donald McQuigg |

On June 2, 2014, the Office of Air Quality (OAQ) received an application from Consolidated Grain and Barge Co. related to the transition of a SSOA to a MSOP.

Existing Approvals

The source has been operating under SSOA No. S077-21420-00017, issued on August 5, 2005.

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

County Attainment Status

The source is located in Jefferson County (Madison Township).

| Pollutant | Designation |
|--|--|
| SO ₂ | Cannot be classified. |
| CO | Unclassifiable or attainment effective November 15, 1990. |
| O ₃ | Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹ |
| PM _{2.5} | Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} for Madison Township. Unclassifiable or attainment for all townships except Madison Township, effective April 5, 2005, for the annual PM _{2.5} standard. |
| PM _{2.5} | Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard. |
| PM ₁₀ | Unclassifiable effective November 15, 1990. |
| NO ₂ | Cannot be classified or better than national standards. |
| Pb | Unclassifiable or attainment effective December 31, 2011. |
| ¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. | |

- (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. Jefferson 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}**
U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Jefferson County Madison Township as nonattainment for PM_{2.5}. On March 7, 2005, the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM_{2.5} promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.
- (c) **Other Criteria Pollutants**
Jefferson County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Consolidated Grain and Barge Co. on June 2, 2014, relating to a permit transition from a SSOA to a MSOP. The source has not constructed any new emission units since being issued SSOA No. S077-21420-00017 on August 5, 2005.

The source consists of the following permitted emission units:

- (a) One (1) over-head covered grain dump shed, with side enclosures, containing one (1) dump pit (Pit # 1), with a maximum capacity of 420 tons per hour;
- (b) One (1) telescoping barge loading spout, with a maximum capacity of 420 tons per hour; and
- (c) One (1) covered barge loading belt conveyor, with a maximum capacity of 420 tons per hour.
- (d) Fugitive emissions from unpaved roads. [326 IAC 6-4]

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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

| Pollutant | Potential To Emit (tons/year) |
|---------------------------|-------------------------------|
| PM | 120.49 |
| PM10 ⁽¹⁾ | 31.65 |
| PM2.5 ⁽¹⁾ | 3.35 |
| SO ₂ | - |
| NO _x | - |
| VOC | - |
| CO | - |
| GHGs as CO ₂ e | - |
| HAPs | - |

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM₁₀ is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject-to-regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

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 bushels. The source has no permanent storage capacity. 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.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) 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.

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

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 existing source is not a major stationary source, under PSD (326 IAC 2-2), because:

- (1) The potential to emit all PSD regulated pollutants, excluding GHGs, are less than 250 tons per year;
- (2) This source is not one (1) of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1); and
- (3) The potential to emit greenhouse gases (GHGs) is less than the PSD subject-to-regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year. Therefore, pursuant to 326 IAC 2-2, the GHG emissions are not subject to regulation and the PSD requirements do not apply.

326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment New Source Review)

This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because the potential to emit all nonattainment regulated pollutants are less than one hundred (100) tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with an aerodynamic diameter less than 2.5 micrometers (PM_{2.5}), is less than one hundred (100) tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.

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

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

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 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 July 8, 2014, 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.

| |
|---|
| State Rule Applicability – Individual Facilities |
|---|

Grain Handling

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:

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:

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

| Emissions Unit Description | Maximum Process Weight (tons/hr) | 326 IAC 6-3-2 Allowable PM Emissions (lbs/hr) |
|-----------------------------|----------------------------------|---|
| Truck Dump Pit | 420 | 66.9 |
| Barge loading spout | 420 | 66.9 |
| Barge loading belt conveyor | 420 | 66.9 |

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, dump pit choke feeding, and a telescoping spout to ensure compliance with the 326 IAC 6-3-2 limits.

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, 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.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 2, 2014.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. M077-34597-00017. The staff recommends to the Commissioner that MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Donald McQuigg at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-4240 or toll free at 1-800-451-6027 extension 4-4240.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

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

Company Name: Consolidated Grain and Barge Co.
Address City IN Zip: 215 Marina Street, Madison, Indiana 47250
Minor Source Operating Permit No.: M077-34597-00017
Reviewer: Donald McQuigg
Date: June 30, 2014

| Process description | Unlimited/Uncontrolled Potential to Emit (tons/year)* | | | | | | | | | |
|---|---|------------------|-------------------|-----------------|-----|-----|----|--------------------------|------------|------------------|
| | PM | PM ₁₀ | PM _{2.5} | SO ₂ | NOx | VOC | CO | GHG as CO ₂ e | Total HAPs | Worst Single HAP |
| Grain handling (shipping and receiving) | 4.78 | 1.45 | 0.24 | - | - | - | - | - | - | - |
| Grain loading belt conveyor | 2.36 | 1.32 | 0.22 | - | - | - | - | - | - | - |
| Unpaved roads** | 113.34 | 28.89 | 2.89 | - | - | - | - | - | - | - |
| Total Potential to Emit ** | 120.49 | 31.65 | 3.35 | - | - | - | - | - | - | - |

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.

** 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.

**Appendix A: Emission Calculations
Grain Handling Operation**

Company Name: Consolidated Grain and Barge Co.
Address City IN Zip: 215 Marina Street, Madison, Indiana 47250
Minor Source Operating Permit No.: M077-34597-00017
Reviewer: Donald McQuigg
Date: June 30, 2014

1. Grain Throughput*

| Type | Maximum received (bu/yr) | Throughput (bu/yr) | Throughput (ton/yr) |
|----------------|--------------------------|--------------------|---------------------|
| Corn | 1,542,988 | 1,851,586 | 51,844 |
| Soy bean | 761,728 | 914,074 | 25,594 |
| Total = | | | 77,438 |

2. Grain Handling

| Process** | Throughput (tons/year) | Emission Factor (lb/ton) | | | Potential Emissions (ton/year) | | |
|--------------------|---------------------------|--------------------------|--------|---------|--------------------------------|-------------|-------------|
| | | PM | PM10 | PM2.5 | PM | PM10 | PM2.5 |
| Grain Receiving*** | | | | | | | |
| Corn | 51,844 | | | | | | |
| 50% Hopper Truck | 25,922 | 0.035 | 0.0078 | 0.0013 | 0.454 | 0.101 | 0.017 |
| 50% Straight Truck | 25,922 | 0.18 | 0.059 | 0.01 | 2.333 | 0.765 | 0.130 |
| Soybeans | 25,594 | | | | | | |
| 50% Hopper Truck | 12,797 | 0.035 | 0.0078 | 0.0013 | 0.224 | 0.050 | 0.008 |
| 50% Straight Truck | 12,797 | 0.18 | 0.059 | 0.01 | 1.152 | 0.378 | 0.064 |
| Grain Shipping | | | | | | | |
| Corn | 51,844 | | | | | | |
| 100% Barge | 51,844 | 0.016 | 0.004 | 0.00055 | 0.415 | 0.104 | 0.014 |
| Soybeans | 25,594 | | | | | | |
| 100% Barge | 25,594 | 0.016 | 0.004 | 0.00055 | 0.205 | 0.051 | 0.007 |
| Total PTE | | | | | 4.78 | 1.45 | 0.24 |

*Throughput is total maximum amount of grain received equals the 5 year maximum received multiplied by a factor of 1.2. This is based on the EPA memorandum dated November 14, 1995 on calculating the potential to emit and other guidance for grain handling facilities. The source provided this data on July 8, 2014. The grain bulk density used for conversions are: corn = 56 lbs/bu; soy beans = 60 lbs/bu.

** More than one method of receiving is utilized at the source. The source truck counts/receipts indicate 50% Hopper Trucks and 50% Straight Trucks accurately reflects their operation. The source ships exclusively by barge.

Methodology:

Emission factors from AP-42 Ch. 9.9.1, Grain Elevators and Processes, Table 9.9.1-1 (3/03)

Throughput (ton/yr) = Throughput (bu/yr) * Grain Bulk Density (lb/bu) * 1 ton/2000 lbs

Potential Emissions (tons/year) = Throughput (tons/year) x Emission Factor (lb/ton) x 1 ton/2000 pounds

Controlled Emissions (tons/year) = Potential Emissions (tons/year) x (1-Control Efficiency)

Grain throughput is total maximum amount of grain received equals the 5 year maximum received multiplied by a factor of 1.2. This is based on the EPA memorandum dated November 14, 1995 on calculating the potential to emit and other guidance for grain handling facilities. The source provided this data on July 8, 2014.

Appendix A: Emissions Calculations
Particulate Emissions for Conveyor Grain Handling

Company Name: Consolidated Grain and Barge Co.
Address City IN Zip: 215 Marina Street, Madison, Indiana 47250
Minor Source Operating Permit No.: M077-34597-00017
Reviewer: Donald McQuigg
Date: June 30, 2014

Total Grain Throughput (tons/yr) = 77,438

Uncontrolled Emissions

| Emission Unit | Throughput (tons/yr) | PM Emission Factor (lb/ton) | PM ₁₀ Emission Factor (lb/ton) | PM _{2.5} Emission Factor (lb/ton) | Potential PM Emissions (tons/year) | Potential PM ₁₀ Emissions (tons/year) | Potential PM _{2.5} Emissions (tons/year) |
|-----------------------------|----------------------|-----------------------------|---|--|------------------------------------|--|---|
| Barge loading belt conveyor | 77,438 | 0.061 | 0.034 | 0.0058 | 2,3619 | 1,3164 | 0,2246 |
| Total | | | | | 2,362 | 1,316 | 0,225 |

Methodology:

Emission factors from AP-42 Ch. 9.9.1, Grain Elevators and Processes, Table 9.9.1-1 (3/03)

Throughput (ton/yr) = Throughput (bu/yr) * Grain Bulk Density (lb/bu) * 1 ton/2000 lbs

Potential Emissions (tons/year) = Throughput (tons/year) x Emission Factor (lb/ton) x 1 ton/2000 pounds

Controlled Emissions (tons/year) = Potential Emissions (tons/year) x (1-Control Efficiency)

Grain throughput is total maximum amount of grain received equals the 5 year maximum received multiplied by a factor of 1.2. This is based on the EPA memorandum dated November 14, 1995 on calculating the potential to emit and other guidance for grain handling facilities. The source provided this data on July 8, 2014.

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

Company Name: Consolidated Grain and Barge Co.
Address City IN Zip: 215 Marina Street, Madison, Indiana 47250
Minor Source Operating Permit No.: M077-34597-00017
Reviewer: Donald McQuigg
Date: June 30, 2014

| Processes | Maximum Throughput or Process Weight Rate ⁽¹⁾ | | PM Emission Factors ⁽²⁾ (lbs/ton) | Controls | Collection and Control Efficiency (%) | PM Emissions Before Control (lbs/hour) | Allowable PM Emissions Rate ⁽³⁾ (lbs/hour) | PM Emissions After Control (lbs/hour) |
|----------------------------|--|-------------|---|----------|--|--|--|--|
| | (bushels/hour) | (tons/hour) | | | | | | |
| Truck dump pit | - | 420 | 0.1075 | None | 50% | 45.2 | 66.9 | 22.6 |
| Barge loading spout | - | 420 | 0.016 | None | 0% | 6.7 | 66.9 | 6.7 |
| Barge loading belt coveyor | - | 420 | 0.061 | Covered | 50% | 25.6 | 66.9 | 12.8 |

Note 1. The maximum grain processing rates, as listed in the permit, are used to represent the process weight rates for each emission segment.

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. A weighted average PM emission factor is used to reflect the source receiving operation.

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
Fugitive Dust Emissions - Unpaved Roads

Company Name: Consolidated Grain and Barge Co.
Address City IN Zip: 215 Marina Street, Madison, Indiana 47250
Minor Source Operating Permit No.: M077-34597-00017
Reviewer: Donald McQuigg
Date: June 30, 2014

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

| Type | Maximum number of vehicles | Number of one-way trips per day per vehicle | Maximum trips per day (trip/day) | Maximum Weight Loaded (tons/trip) | Total Weight driven per day (ton/day) | Maximum one-way distance (feet/trip) | Maximum one-way distance (mi/trip) | Maximum one-way miles (miles/day) | Maximum one-way miles (miles/yr) |
|---|----------------------------|---|----------------------------------|-----------------------------------|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------------|----------------------------------|
| Semi (loaded, entering plant) (one-way trip) | | | 120.0 | 40.0 | 4800.0 | 1954 | 0.370 | 44.4 | 16209.3 |
| Semi (unloaded, leaving plant) (one-way trip) | | | 120.0 | 15.0 | 1800.0 | 1954 | 0.370 | 44.4 | 16209.3 |
| Totals | | | 240.0 | | 6600.0 | | | 88.8 | 32418.6 |

Average Vehicle Weight Per Trip = 27.5 tons/trip
 Average Miles Per Trip = 0.37 miles/trip

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

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

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

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

| | PM | PM10 | PM2.5 | |
|--|------|------|-------|---|
| Unmitigated Emission Factor, $E_f =$ | 6.99 | 1.78 | 0.18 | lb/mile |
| Mitigated Emission Factor, $E_{ext} =$ | 4.60 | 1.17 | 0.12 | lb/mile |
| Dust Control Efficiency = | 50% | 50% | 50% | (pursuant to control measures outlined in Attachment A, Fugitive Dust Control Plan) |

| Type | Unmitigated PTE of PM (tons/yr) | Unmitigated PTE of PM10 (tons/yr) | Unmitigated PTE of PM2.5 (tons/yr) | Mitigated PTE of PM (tons/yr) | Mitigated PTE of PM10 (tons/yr) | Mitigated PTE of PM2.5 (tons/yr) | Controlled PTE of PM (tons/yr) | Controlled PTE of PM10 (tons/yr) | Controlled PTE of PM2.5 (tons/yr) |
|--------------------------------------|---------------------------------|-----------------------------------|------------------------------------|-------------------------------|---------------------------------|----------------------------------|--------------------------------|----------------------------------|-----------------------------------|
| Semi (entering plant) (one-way trip) | 56.67 | 14.44 | 1.44 | 37.26 | 9.50 | 0.95 | 18.63 | 4.75 | 0.47 |
| Semi (leaving plant) (one-way trip) | 56.67 | 14.44 | 1.44 | 37.26 | 9.50 | 0.95 | 18.63 | 4.75 | 0.47 |
| Totals | 113.34 | 28.89 | 2.89 | 74.53 | 18.99 | 1.90 | 37.26 | 9.50 | 0.95 |

Methodology

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

Abbreviations

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



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

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

TO: Scott Perkins
Consolidated Grain and Barge Co.
215 Marina St.
Madison, IN 47250-0225

DATE: September 9, 2014

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

SUBJECT: Final Decision
Minor Source Operating Permit (MSOP)
077-34597-00017

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

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

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

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

Final Applicant Cover letter.dot 6/13/2013



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

September 9, 2014

TO: Jefferson County Public Library

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

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


Applicant Name: Consolidated Grain and Barge Co.
Permit Number: 077-34597-00017

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 9/9/2014 Consolidated Grain & Barge-Madison 077-34597-00017 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 | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handling Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee |
|------|----------------|---|---------|------------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|
| | | | | | | | | | | | Remarks |
| 1 | | Scott Perkins Consolidated Grain & Barge-Madison 215 Marina St Madison IN 47250-0225 (Source CAATS) | | | CONFIRMED DELIVERY | | | | | | |
| 2 | | Jefferson County Health Department 715 Green Rd Madison IN 47250-2143 (Health Department) | | | | | | | | | |
| 3 | | Madison Jefferson Co Public Library 420 W Main St Madison IN 47250-3796 (Library) | | | | | | | | | |
| 4 | | Jefferson County Commissioners & Planning Board 300 E Main Street Madison IN 47250 (Local Official) | | | | | | | | | |
| 5 | | | | | | | | | | | |
| 6 | | | | | | | | | | | |
| 7 | | | | | | | | | | | |
| 8 | | | | | | | | | | | |
| 9 | | | | | | | | | | | |
| 10 | | | | | | | | | | | |
| 11 | | | | | | | | | | | |
| 12 | | | | | | | | | | | |
| 13 | | | | | | | | | | | |
| 14 | | | | | | | | | | | |
| 15 | | | | | | | | | | | |

| | | | |
|---|--|--|--|
| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
| 3 | | | |