



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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and  
Minor Source Operating Permit (MSOP)

for Bunge North America (East), LLC in DeKalb County

MSOP No.: M033-36462-00004

The Indiana Department of Environmental Management (IDEM) has received an application from Bunge North America (East), LLC, located at 4743 County Road 28, Waterloo, Indiana 46793, for a new source construction and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Bunge North America (East), LLC to construct and operate a new grain handling facility.

The applicant intends to construct and operate new equipment that will emit air pollutants. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Waterloo Grant TWP Public Library  
300 South Wayne Street  
Waterloo, IN 46793

and

IDEM Northern Regional Office  
300 N. Michigan Street, Suite 450  
South Bend, IN 46601-1295

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

### How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so

that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M033-36462-00004 in all correspondence.

**Comments should be sent to:**

Deena Patton  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-5400  
Or dial directly: (317) 234-5400  
Fax: (317) 232-6749 attn: Deena Patton  
E-mail: dpatton2@idem.IN.gov

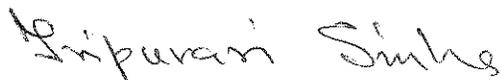
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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>.

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Deena Patton of my staff at the above address.



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



Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

DRAFT

# New Source Construction and Minor Source Operating Permit

## OFFICE OF AIR QUALITY

**Bunge North Americal (East), LLC**  
**4743 County Road 28**  
**Waterloo, Indiana 46793**

(herein known as the Permittee) is hereby authorized to construct and 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 2-5.1, 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.: M033-36462-00004	
Issued by:	Issuance Date:
Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date:

## TABLE OF CONTENTS

<b>SECTION A</b>	<b>SOURCE SUMMARY .....</b>	<b>4</b>
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>SECTION B</b>	<b>GENERAL CONDITIONS .....</b>	<b>8</b>
B.1	Definitions [326 IAC 2-1.1-1]	
B.2	Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3	Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]	
B.4	Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.5	Term of Conditions [326 IAC 2-1.1-9.5]	
B.6	Enforceability	
B.7	Severability	
B.8	Property Rights or Exclusive Privilege	
B.9	Duty to Provide Information	
B.10	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.12	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.13	Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.14	Permit Renewal [326 IAC 2-6.1-7]	
B.15	Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.16	Source Modification Requirement	
B.17	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 13-3 0-3-1]	
B.18	Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.19	Annual Fee Payment [326 IAC 2-1.1-7]	
B.20	Credible Evidence [326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS.....</b>	<b>13</b>
	<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)] .....</b>	<b>13</b>
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	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	<b>Testing Requirements [326 IAC 2-6.1-5(a)(2)] .....</b>	<b>15</b>
C.8	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11] .....</b>	<b>15</b>
C.9	Compliance Requirements [326 IAC 2-1.1-11]	
	<b>Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)] .....</b>	<b>15</b>
C.10	Compliance Monitoring [326 IAC 2-1.1-11]	
C.11	Instrument Specifications [326 IAC 2-1.1-11]	
	<b>Corrective Actions and Response Steps.....</b>	<b>16</b>
C.12	Response to Excursions or Exceedances	
C.13	Actions Related to Noncompliance Demonstrated by a Stack Test	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)] .....</b>	<b>17</b>
C.14	Malfunctions Report [326 IAC 1-6-2]	

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

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS ..... 19**

- Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]..... 22**
- D.1.1 Particulate Limitation [326 IAC 6-3-2]
- D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

**ANNUAL NOTIFICATION ..... 24**

**MALFUNCTION REPORT ..... 25**

**Affidavit of Construction ..... 27**

## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary grain handling facility.

Source Address:	4743 County Road 28, Waterloo, Indiana 46793
General Source Phone Number:	260-837-2900
SIC Code:	5153
County Location:	De Kalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Grain receiving operation, identified as F001, with a maximum receiving rate of 16,029,333 bushels of grain per year (51.24 tons per hour), and consisting of the following:
  - (1) Two (2) truck receiving stations, identified as Pits 1 and 2, approved in 2016 for construction, each with a maximum capacity of 750 tons per hour.
  - (2) One (1) truck receiving station, identified as Pit 3, constructed before 1977, and permitted in 2016, with a maximum capacity of 450 tons per hour.
  - (3) One (1) railcar receiving station, with a maximum capacity of 450 tons per hour.
- (b) Grain handling and internal transfer operation, identified as F002, with a total maximum handling capacity of 35,200,000 bushels of grain per year (112.51 tons per hour) and consisting of the following:
  - (1) Two (2) totally enclosed grain elevator legs, identified as P1-1a and P1-1b, approved in 2016 for construction, each with a capacity of 25,000 bushels per hour each (700 tons per hour each).
  - (2) One (1) totally enclosed grain elevator dry leg, identified as P1-1c, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (3) One (1) totally enclosed grain elevator wet leg, identified as P1-1d, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

- (4) One (1) totally enclosed rail loadout leg, identified as P1-1e, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).
- (5) One (1) totally enclosed InterSystems Cleaner, identified as P1-1s, constructed before 1977, with a maximum capacity of 40,000 bushels per hour (1120 tons per hour).
- (6) One (1) totally enclosed Pit 1 drag conveyor, identified as P1-1f, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (7) One (1) totally enclosed Pit 2 drag conveyor, identified as P1-1g, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (8) One (1) totally enclosed Receiving 1 drag conveyor, identified as P1-1h, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (9) One (1) totally enclosed Receiving 2 drag conveyor, identified as P1-1i, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (10) One (1) totally enclosed East 1 Distribution drag conveyor, identified as P1-1j, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (11) One (1) totally enclosed East 2 Distribution drag conveyor, identified as P1-1k, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (12) One (1) totally enclosed Riley drag conveyor, identified as P1-1l, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (13) One (1) totally enclosed Riley drag conveyor, identified as P1-1m, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (14) One (1) totally enclosed pile drag conveyor, identified as P1-1n, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (15) One (1) totally enclosed ground pile drag conveyor, identified as P1-1o, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (16) One (1) totally enclosed Reclaim 2 belt conveyor, identified as P1-1p, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (17) One (1) totally enclosed Receiving belt conveyor, identified as P1-1q, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (18) One (1) totally enclosed 7-8-9 East Reclaim drag conveyor, approved in 2016 for construction, identified as P1-1r, with a capacity of 25,000 bushels per hour (700 tons per hour).

- (19) One (1) totally enclosed West feed conveyor, identified as P1-1t, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
  - (20) One (1) totally enclosed 401 feed conveyor, identified as P1-1w, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
  - (21) One (1) totally enclosed 5-6 side tap drag conveyor, identified as P1-1x, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (22) One (1) totally enclosed 401 belt conveyor, identified as P1-1y, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (23) One (1) totally enclosed West Reclaim drag conveyor, identified as P1-1z, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (24) One (1) totally enclosed Cleaner screw conveyor, constructed before 1977, with a capacity of 5,000 bushels per hour (140 tons per hour).
  - (25) One (1) totally enclosed Rail Bridge belt conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).
  - (26) One (1) totally enclosed Cleaner screw conveyor, constructed before 1977, with a capacity of 5,000 bushels per hour (140 tons per hour).
  - (27) One (1) totally enclosed existing Rail Bridge belt conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).
  - (28) One (1) totally enclosed Rail Reclaim conveyor, approved in 2016 for construction, identified as P1-1v, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (29) One (1) totally enclosed Dryer Feed conveyor, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (30) One (1) totally enclosed Dryer Discharge conveyor, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (31) One (1) totally enclosed existing 7-8-9 side tap conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1,680 tons per hour).
  - (32) One (1) totally enclosed 301 Reclaim screw conveyor, approved in 2016 for construction, with a capacity of 7,500 bushels per hour (210 tons per hour).
  - (33) One (1) totally enclosed 302 Reclaim screw conveyor, approved in 2016 for construction, with a capacity of 7,500 bushels per hour (210 tons per hour).
- (c) Grain Storage System, identified as F003, constructed before 1977 and modified in 1994, with a total storage capacity of 2.2 million bushels (61,600 tons), controlled by enclosures, and consisting of the following:
- (1) Two (2) steel storage bins, identified as Bins 1001 and 1101, constructed before

- 1977 and modified in 1994, each with a storage capacity of 600,000 bushels (16800 tons).
- (2) Three (3) concrete storage silos, identified as Bins 401, 501, and 601, constructed before 1977 and modified in 1994, each with a storage capacity of 91,000 bushels (2548 tons).
  - (3) Three (3) concrete storage silos, identified as Bins 701, 801, and 901, constructed before 1977 and modified in 1994, each with a storage capacity of 162,000 bushels (4536 tons).
  - (4) Three (3) concrete storage silos, identified as Bins 101, 301, and 302, constructed before 1977 and modified in 1994, each with a storage capacity of 27,000 bushels (756 tons).
  - (5) Four (4) concrete storage silos, identified as Bins 202, 203, 204, and 205, constructed before 1977 and modified in 1994, each with a storage capacity of 5,000 bushels (140 tons).
  - (6) One (1) concrete storage silo, identified as Bin 102A/102B, constructed before 1977 and modified in 1994, with a storage capacity of 25,000 bushels (700 tons).
  - (7) One (1) concrete storage silo, identified as Bin 201, constructed before 1977 and modified in 1994, with a storage capacity of 7,600 bushels (212.8 tons).
- (d) Two (2) temporary open grain storage piles, identified as F004, constructed before 1977, with a total maximum storage capacity of 2,200,000 bushels of grain (61,600 tons).
- (e) One (1) Zimmerman grain dryer, identified as F005, approved in 2016 for construction, with a perforated screen plate (column dryer) and a maximum drying capacity of 366 bushels of grain per hour (10.23 tons per hour). The dryer burner burns natural gas and has a maximum heat input capacity of 108 MMBtu per hour.
- (f) Grain Loadout operation, with a maximum capacity of 60,000 bushels per hour (1680 tons per hour), constructed before in 1977 and modified in 1994 and 2005, and consisting of the following:
- (1) One (1) Railcar Loadout site, identified as F006, constructed before in 1977 and modified in 1994 and 2005, with a maximum throughput rate of 1740 tons per hour.
  - (2) One (1) Truck Loadout site, identified as F007, constructed before in 1977 and modified in 1994 and 2005, with a maximum throughput rate of 1740 tons per hour.
  - (3) One (1) Rail Loading scale system, identified as P1-1uk, constructed before in 1977 and modified in 1994 and 2005, and exhausting to baghouse DFS-2 for particulate control.
- (g) Unpaved roads and parking lots with public access.

## SECTION B GENERAL CONDITIONS

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

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

### B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, M033-36462-00004, 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.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

### B.6 Enforceability

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

**B.7 Severability**

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

**B.8 Property Rights or Exclusive Privilege**

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

**B.9 Duty to Provide Information**

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

**B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.11 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (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.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M033-36462-00004 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.13 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.14 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.15 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.16 Source Modification Requirement

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

B.17 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.18** 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.19** 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.20** 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 construct and operate may be revoked for any of the following causes:

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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

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

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than

twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

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

### **Corrective Actions and Response Steps**

#### **C.12 Response to Excursions or Exceedances**

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

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

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

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ

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

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

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

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

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) 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) Grain receiving operation, identified as F001, with a maximum receiving rate of 16,029,333 bushels of grain per year (51.24 tons per hour), and consisting of the following:
  - (1) Two (2) truck receiving stations, identified as Pits 1 and 2, approved in 2016 for construction, each with a maximum capacity of 750 tons per hour.
  - (2) One (1) truck receiving station, identified as Pit 3, constructed before 1977, and permitted in 2016, with a maximum capacity of 450 tons per hour.
  - (3) One (1) railcar receiving station, with a maximum capacity of 450 tons per hour.
  
- (b) Grain handling and internal transfer operation, identified as F002, with a total maximum handling capacity of 35,200,000 bushels of grain per year (112.51 tons per hour) and consisting of the following:
  - (1) Two (2) totally enclosed grain elevator legs, identified as P1-1a and P1-1b, approved in 2016 for construction, each with a capacity of 25,000 bushels per hour each (700 tons per hour each).
  - (2) One (1) totally enclosed grain elevator dry leg, identified as P1-1c, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (3) One (1) totally enclosed grain elevator wet leg, identified as P1-1d, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
  - (4) One (1) totally enclosed rail loadout leg, identified as P1-1e, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).
  - (5) One (1) totally enclosed InterSystems Cleaner, identified as P1-1s, constructed before 1977, with a maximum capacity of 40,000 bushels per hour (1120 tons per hour).
  - (6) One (1) totally enclosed Pit 1 drag conveyor, identified as P1-1f, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
  - (7) One (1) totally enclosed Pit 2 drag conveyor, identified as P1-1g, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
  - (8) One (1) totally enclosed Receiving 1 drag conveyor, identified as P1-1h, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
  - (9) One (1) totally enclosed Receiving 2 drag conveyor, identified as P1-1i, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

- (10) One (1) totally enclosed East 1 Distribution drag conveyor, identified as P1-1j, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (11) One (1) totally enclosed East 2 Distribution drag conveyor, identified as P1-1k, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (12) One (1) totally enclosed Riley drag conveyor, identified as P1-1l, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (13) One (1) totally enclosed Riley drag conveyor, identified as P1-1m, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (14) One (1) totally enclosed pile drag conveyor, identified as P1-1n, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (15) One (1) totally enclosed ground pile drag conveyor, identified as P1-1o, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (16) One (1) totally enclosed Reclaim 2 belt conveyor, identified as P1-1p, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (17) One (1) totally enclosed Receiving belt conveyor, identified as P1-1q, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (18) One (1) totally enclosed 7-8-9 East Reclaim drag conveyor, approved in 2016 for construction, identified as P1-1r, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (19) One (1) totally enclosed West feed conveyor, identified as P1-1t, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (20) One (1) totally enclosed 401 feed conveyor, identified as P1-1w, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (21) One (1) totally enclosed 5-6 side tap drag conveyor, identified as P1-1x, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (22) One (1) totally enclosed 401 belt conveyor, identified as P1-1y, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (23) One (1) totally enclosed West Reclaim drag conveyor, identified as P1-1z, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (24) One (1) totally enclosed Cleaner screw conveyor, constructed before 1977, with a capacity of 5,000 bushels per hour (140 tons per hour).

- (25) One (1) totally enclosed Rail Bridge belt conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).
  - (26) One (1) totally enclosed Cleaner screw conveyor, constructed before 1977, with a capacity of 5,000 bushels per hour (140 tons per hour).
  - (27) One (1) totally enclosed existing Rail Bridge belt conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).
  - (28) One (1) totally enclosed Rail Reclaim conveyor, approved in 2016 for construction, identified as P1-1v, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (29) One (1) totally enclosed Dryer Feed conveyor, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (30) One (1) totally enclosed Dryer Discharge conveyor, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (31) One (1) totally enclosed existing 7-8-9 side tap conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1,680 tons per hour).
  - (32) One (1) totally enclosed 301 Reclaim screw conveyor, approved in 2016 for construction, with a capacity of 7,500 bushels per hour (210 tons per hour).
  - (33) One (1) totally enclosed 302 Reclaim screw conveyor, approved in 2016 for construction, with a capacity of 7,500 bushels per hour (210 tons per hour).
- (c) Grain Storage System, identified as F003, constructed before 1977 and modified in 1994, with a total storage capacity of 2.2 million bushels (61,600 tons), controlled by enclosures, and consisting of the following:
- (1) Two (2) steel storage bins, identified as Bins 1001 and 1101, constructed before 1977 and modified in 1994, each with a storage capacity of 600,000 bushels (16800 tons).
  - (2) Three (3) concrete storage silos, identified as Bins 401, 501, and 601, constructed before 1977 and modified in 1994, each with a storage capacity of 91,000 bushels (2548 tons).
  - (3) Three (3) concrete storage silos, identified as Bins 701, 801, and 901, constructed before 1977 and modified in 1994, each with a storage capacity of 162,000 bushels (4536 tons).
  - (4) Three (3) concrete storage silos, identified as Bins 101, 301, and 302, constructed before 1977 and modified in 1994, each with a storage capacity of 27,000 bushels (756 tons).
  - (5) Four (4) concrete storage silos, identified as Bins 202, 203, 204, and 205, constructed before 1977 and modified in 1994, each with a storage capacity of 5,000 bushels (140 tons).
  - (6) One (1) concrete storage silo, identified as Bin 102A/102B, constructed before 1977 and modified in 1994, with a storage capacity of 25,000 bushels (700 tons).

tons).
(7) One (1) concrete storage silo, identified as Bin 201, constructed before 1977 and modified in 1994, with a storage capacity of 7,600 bushels (212.8 tons).
(d) Two (2) temporary open grain storage piles, identified as F004, constructed before 1977, with a total maximum storage capacity of 2,200,000 bushels of grain (61,600 tons).
(e) One (1) Zimmerman grain dryer, identified as F005, approved in 2016 for construction, with a perforated screen plate (column dryer) and a maximum drying capacity of 366 bushels of grain per hour (10.23 tons per hour). The dryer burner burns natural gas and has a maximum heat input capacity of 108 MMBtu per hour.
(f) Grain Loadout operation, with a maximum capacity of 60,000 bushels per hour (1680 tons per hour), constructed before in 1977 and modified in 1994 and 2005, and consisting of the following:
(1) One (1) Railcar Loadout site, identified as F006, constructed before in 1977 and modified in 1994 and 2005, with a maximum throughput rate of 1740 tons per hour.
(2) One (1) Truck Loadout site, identified as F007, constructed before in 1977 and modified in 1994 and 2005, with a maximum throughput rate of 1740 tons per hour.
(3) One (1) Rail Loading scale system, identified as P1-1uk, constructed before in 1977 and modified in 1994 and 2005, and exhausting to baghouse DFS-2 for particulate control.
(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 Limitation [326 IAC 6-3-2]**

- (a) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the grain receiving and handling operation shall not exceed the particulate emission limit in pounds per hour as shown in the table below.

Emission Unit	Max. Throughput Rate (tons/hour)	Particulate Emissions Limit (lb/hour)
One (1) Rail Receiving	450	67.7
Truck Receiving Pits 1 and 2 (Each)	750	73.9
Truck Receiving Pit 3	450	67.7
Zimmerman Grain Dryer	10.23	31.03
Railcar Loadout (F006)	1740	85.0
Truck Loadout (F007)	1740	85.0
Grain Handling and Transfer Operation (F002)	112.51	52.47

The pound per hour limitations were calculated using the following equations:

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

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

Where

E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

- (b) Pursuant to 326 IAC 6-3-2(e)(3), since the process weight exceeds 200 tons per hour, the above emission units may exceed the emission limit calculated using the equation, as long as the concentration of particulate matter in the gas discharged to the atmosphere remains less than 0.10 pounds per 1,000 pounds of gases.

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

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A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan 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).

<b>Company Name:</b>	Bunge North Americal (East), LLC
<b>Address:</b>	4743 County Road 28
<b>City:</b>	Waterloo, Indiana 46793
<b>Phone #:</b>	260-837-2900
<b>MSOP #:</b>	M033-36462-00004

I hereby certify that Bunge North Americal (East), LLC is :  still in operation.

no longer in operation.

I hereby certify that Bunge North Americal (East), LLC is :  in compliance with the requirements of MSOP M033-36462-00004.

not in compliance with the requirements of MSOP M033-36462-00004.

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

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

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

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

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

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

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

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

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

COMPANY: \_\_\_\_\_ PHONE NO. ( ) \_\_\_\_\_

LOCATION: (CITY AND COUNTY) \_\_\_\_\_

PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

Bunge North Americal (East), LLC  
4743 County Road 28  
Waterloo, Indiana 46793

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Bunge North Americal (East), LLC 4743 County Road 28, Waterloo, Indiana 46793, completed construction of the grain handling facility on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on November 6, 2015 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M033-36462-00004, Plant ID No. 033-00004 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

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

Technical Support Document (TSD) for a Permit by Rule Transitioning to a  
Minor Source Operating Permit (MSOP) with New Source Review (NSR)

**Source Description and Location**

**Source Name:** Bunge North America (East), LLC  
**Source Location:** 4743 County Road 28, Waterloo, IN 46793  
**County:** DeKalb  
**SIC Code:** 5153 (Grain and Field Beans)  
**Operation Permit No.:** 033-36462-00004  
**Permit Reviewer:** Deena Patton

On November 06, 2015, the Office of Air Quality (OAQ) received an application from Bunge North America (East), LLC related to the construction and operation of new emission units at an existing grain handling facility and transition from a Permit by Rule (PBR) to a MSOP.

**Existing Approvals**

The source has been operating under Permit by Rule No. 033-29939-00004, issued on December 20, 2010.

Due to this application, the source is transitioning from a Permit by Rule to a MSOP.

**County Attainment Status**

The source is located in DeKalb County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> 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<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
DeKalb County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
DeKalb 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 regulated pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

#### Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Bunge North America (East), LLC on November 6, 2015 relating the reconstruction of the facility after a fire in February 2015. The reconstruction will also increase the maximum grain receiving and handling capacity, requiring a permit level transition from the current Permit by Rule to a MSOP.

#### **The source consists of the following permitted emission units:**

- (a) Grain receiving operation, identified as F001, with a maximum receiving rate of 16,029,333 bushels of grain per year, and consisting of the following:
  - (2) One (1) truck receiving station, identified as Pit 3, constructed before 1977, and permitted in 2016, with a maximum capacity of 450 tons per hour.
  - (3) One (1) railcar receiving station, with a maximum capacity of 450 tons per hour.
- (b) Grain handling and internal transfer operation, identified as F002, with a total maximum handling capacity of 35,200,000 bushels of grain per year (112.51 tons per hour) and consisting of the following:
  - (4) One (1) totally enclosed rail loadout leg, identified as P1-1e, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).
  - (5) One (1) totally enclosed InterSystems Cleaner, identified as P1-1s, constructed before 1977, with a maximum capacity of 40,000 bushels per hour (1120 tons per hour).
  - (12) One (1) totally enclosed Riley drag conveyor, identified as P1-1l, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (13) One (1) totally enclosed Riley drag conveyor, identified as P1-1m, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (14) One (1) totally enclosed pile drag conveyor, identified as P1-1n, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).

- (15) One (1) totally enclosed ground pile drag conveyor, identified as P1-1o, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (16) One (1) totally enclosed Reclaim 2 belt conveyor, identified as P1-1p, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (17) One (1) totally enclosed Receiving belt conveyor, identified as P1-1q, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (22) One (1) totally enclosed 401 belt conveyor, identified as P1-1y, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (23) One (1) totally enclosed West Reclaim drag conveyor, identified as P1-1z, constructed before 1977, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (24) One (1) totally enclosed Cleaner screw conveyor, constructed before 1977, with a capacity of 5,000 bushels per hour (140 tons per hour).
  - (25) One (1) totally enclosed Rail Bridge belt conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).
  - (26) One (1) totally enclosed Cleaner screw conveyor, constructed before 1977, with a capacity of 5,000 bushels per hour (140 tons per hour).
  - (27) One (1) totally enclosed existing Rail Bridge belt conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1680 tons per hour).
  - (31) One (1) totally enclosed existing 7-8-9 side tap conveyor, constructed before 1977, with a capacity of 60,000 bushels per hour (1,680 tons per hour).
- (c) Grain Storage System, identified as F003, constructed before 1977 and modified in 1994, with a total storage capacity of 2.2 million bushels (61,600 tons), controlled by enclosures, and consisting of the following:
- (1) Two (2) steel storage bins, identified as Bins 1001 and 1101, constructed before 1977 and modified in 1994, each with a storage capacity of 600,000 bushels (16800 tons).
  - (2) Three (3) concrete storage silos, identified as Bins 401, 501, and 601, constructed before 1977 and modified in 1994, each with a storage capacity of 91,000 bushels 2548 tons).
  - (3) Three (3) concrete storage silos, identified as Bins 701, 801, and 901, constructed before 1977 and modified in 1994, each with a storage capacity of 162,000 bushels (4536 tons).
  - (4) Three (3) concrete storage silos, identified as Bins 101, 301, and 302, constructed before 1977 and modified in 1994, each with a storage capacity of 27,000 bushels (756 tons).
  - (5) Four (4) concrete storage silos, identified as Bins 202, 203, 204, and 205, constructed before 1977 and modified in 1994, each with a storage capacity of 5,000 bushels (140 tons).
  - (6) One (1) concrete storage silo, identified as Bin 102A/102B, constructed before 1977 and modified in 1994, with a storage capacity of 25,000 bushels (700 tons).
  - (7) One (1) concrete storage silo, identified as Bin 201, constructed before 1977 and modified in 1994, with a storage capacity of 7,600 bushels (212.8 tons).

- (d) Two (2) temporary open grain storage piles, identified as F004, constructed before 1977, with a total maximum storage capacity of 2,200,000 bushels of grain (61,600 tons).
- (f) Grain Loadout operation, with a maximum capacity of 60,000 bushels per hour (1680 tons per hour), constructed before in 1977 and modified in 1994 and 2005, and consisting of the following:
  - (1) One (1) Railcar Loadout site, identified as F006, constructed before in 1977 and modified in 1994 and 2005, with a maximum throughput rate of 1740 tons per hour.
  - (2) One (1) Truck Loadout site, identified as F007, constructed before in 1977 and modified in 1994 and 2005, with a maximum throughput rate of 1740 tons per hour.
  - (3) One (1) Rail Loading scale system, identified as P1-1uk, constructed before in 1977 and modified in 1994 and 2005, and exhausting to baghouse DFS-2 for particulate control.
- (g) Unpaved roads and parking lots with public access.

**The following is a list of the new or modified emission units and pollution control devices:**

- (a) Grain receiving operation, identified as F001, with a maximum receiving rate of 16,029,333 bushels of grain per year (51.24 tons per hour), and consisting of the following:
  - (1) Two (2) truck receiving stations, identified as Pits 1 and 2, approved in 2016 for construction, each with a maximum capacity of 750 tons per hour.
- (b) Grain handling and internal transfer operation, identified as F002, approved in 2016 for construction, with a total maximum handling capacity of 35,200,000 bushels of grain per year (112.51 tons per hour) and consisting of the following:
  - (1) Two (2) totally enclosed grain elevator legs, identified as P1-1a and P1-1b, approved in 2016 for construction, each with a capacity of 25,000 bushels per hour each (700 tons per hour each).
  - (2) One (1) totally enclosed grain elevator dry leg, identified as P1-1c, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
  - (3) One (1) totally enclosed grain elevator wet leg, identified as P1-1d, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
  - (6) One (1) totally enclosed Pit 1 drag conveyor, identified as P1-1f, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
  - (7) One (1) totally enclosed Pit 2 drag conveyor, identified as P1-1g, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
  - (8) One (1) totally enclosed Receiving 1 drag conveyor, identified as P1-1h, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
  - (9) One (1) totally enclosed Receiving 2 drag conveyor, identified as P1-1i, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
  - (10) One (1) totally enclosed East 1 Distribution drag conveyor, identified as P1-1j, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
  - (11) One (1) totally enclosed East 2 Distribution drag conveyor, identified as P1-1k, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).

- (18) One (1) totally enclosed 7-8-9 East Reclaim drag conveyor, approved in 2016 for construction, identified as P1-1r, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (19) One (1) totally enclosed West feed conveyor, identified as P1-1t, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (20) One (1) totally enclosed 401 feed conveyor, identified as P1-1w, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (21) One (1) totally enclosed 5-6 side tap drag conveyor, identified as P1-1x, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (26) One (1) totally enclosed Center Reclaim drag conveyor, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (27) One (1) totally enclosed Top Rail conveyor, approved in 2016 for construction, with a capacity of 25,000 bushels per hour (700 tons per hour).
- (28) One (1) totally enclosed Rail Reclaim conveyor, approved in 2016 for construction, identified as P1-1v, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (29) One (1) totally enclosed Dryer Feed conveyor, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (30) One (1) totally enclosed Dryer Discharge conveyor, approved in 2016 for construction, with a capacity of 15,000 bushels per hour (420 tons per hour).
- (32) One (1) totally enclosed 301 Reclaim screw conveyor, approved in 2016 for construction, with a capacity of 7,500 bushels per hour (210 tons per hour).
- (33) One (1) totally enclosed 302 Reclaim screw conveyor, approved in 2016 for construction, with a capacity of 7,500 bushels per hour (210 tons per hour).
- (e) One (1) Zimmerman grain dryer, identified as F005, approved in 2016 for construction, with a perforated screen plate (column dryer) and a maximum drying capacity of 366 bushels of grain per hour (10.23 tons per hour). The dryer burner burns natural gas and has a maximum heat input capacity of 108 MMBtu per hour.

**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	Uncontrolled/Unlimited Potential
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	To Emit of the source (tons/year)
PM	62
PM10 <sup>(1)</sup>	16.8
PM2.5	3.0
SO <sub>2</sub>	0.06
NO <sub>x</sub>	19.3
VOC	0.56
CO	8.5

(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".

HAPs	Potential To Emit (tons/year)
<b>TOTAL HAPs</b>	<b>0.00</b>

- (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 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.

**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 the source has a grain terminal elevator capacity of 2.3 million U.S. bushels which is less than 2.5 million U.S. bushels. Pursuant to 40 CFR, Subpart 60.301(c), is not subject to NSPS Subpart DD.
- (b) The Zimmerman grain dryer burner is not a steam generating unit. Therefore, the requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc), which is incorporated by reference as 326 IAC 12 are not included in this permit.
- (c) There are no other 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)

- (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

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
  
- (b) 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 of all PSD regulated pollutants are less than 250 tons per year,
  - (2) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
  
- (c) 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 from emission units constructed after 1997. Therefore, none of the emission units constructed after 1997 are subject to the provisions of 326 IAC 2-4.1.
  
- (d) 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.
  
- (e) 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.
  
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
The source is subject to the requirements of 326 IAC 6-4. 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 not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.
  
- (g) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
  
- (h) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

#### **State Rule Applicability - Grain Receiving and Handling**

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

- (a) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the grain receiving and handling operation shall not exceed the particulate emission limit in pounds per hour as shown in the table below.

Emission Unit	Max. Throughput Rate (tons/hour)	Max. Throughput Rate (bushels/hour)	Particulate Emissions Limit (lb/hour)
One (1) Rail Receiving	450	17,716	67.7
Truck Receiving Pits 1 and 2 (Each)	750	29,527	73.9
Truck Receiving Pit 3	450	17,716	67.7
Zimmerman Grain Dryer	10.23	365.30	31.03
Railcar Loadout	1740	68,503	85.0
Truck Loadout	1740	68,503	85.0
Grain Handling and Transfer Operation (F002)	112.51	4,018	52.47

The pound per hour limitations were calculated using the following equations:

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

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

Where

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

- (b) Pursuant to 326 IAC 6-3-2(e)(3), since the process weight exceeds 200 tons per hour, the above emission units may exceed the emission limit calculated using the equation, as long as the concentration of particulate matter in the gas discharged to the atmosphere remains less than 0.10 pounds per 1,000 pounds of gases.

**326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)**

The grain handling facilities at this source do not have potential VOC emissions. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

According to AP-42, Chapter 9.9.1.2, grain drying operations may emit small quantities of VOCs. However, no data is available to quantify these emissions except for the VOC emissions from natural gas combustion in the grain dryers (equal to 2.55 tons per year). Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

**Compliance Determination, Monitoring and Testing Requirements**

- (a) There are no compliance determination and monitoring requirements applicable to this source.  
 (b) There are no testing requirements applicable to this source.

**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 November 6, 2015.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. M033-36462-00004. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

<b>IDEM Contact</b>
---------------------

- (a) Questions regarding this proposed permit can be directed to Deena Patton 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) 234-5400 or toll free at 1-800-451-6027 extension 4-5400.
- (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>.

**Appendix A: Emission Calculations  
Potential to Emit Summary**

**Company Name:** Bunge North America (East), LLC  
**Address:** 4743 County Road 28, Waterloo, Indiana 46793  
**Permit No.** 033-36462-00004  
**Reviewer:** Deena Patton

Uncontrolled Potential-to-Emit (tons per year)							
Emission Units	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
Grain Dryer - NG Combustion	**	**	**	0.06	19.31	0.56	8.54
Grain Receiving	15.4	4.33	1.14	-	-	-	-
Grain Elevator	11.0	3.8	0.6	-	-	-	-
Rail Loading Scale	9.31	1.81	0.31	-	-	-	-
Grain Dryer.	9.9	2.5	0.42	-	-	-	-
<b><i>Fugitive Emissions</i></b>							
Roadway	16.4	4.4	0.4	-	-	-	-
Grain Storage Piles	0.14	0.05	0.01	-	-	-	-
<b>TOTAL</b>	<b>62</b>	<b>16.8</b>	<b>3.0</b>	<b>0.06</b>	<b>19.3</b>	<b>0.56</b>	<b>8.5</b>

**Appendix A: Emission Calculations  
Particulate Emissions  
From Grain Storage Piles (Fugitive)**

**Company Name:** Bunge North America (East), LLC  
**Address:** 4743 County Road 28, Waterloo, Indiana 46793  
**Permit No.:** 033-36462-00004  
**Reviewer:** Deena Patton

**1. Emission Factors:**

According to AP-42, Chapter 13.2.4 - Aggregate Handling and Storage Piles, the PM/PM10/PM2.5 emission factors for storage piles can be estimated from the following equation:

$$E_f = \frac{.0032 \times (U/5)^{1.3} \times k}{(M/2)^{1.4}}$$

where:

Ef = Emission Factor (lbs/ton)	
k = Particle size multiplier =	1 for PM, 0.35 for PM10, and 0.053 for PM2.5
U = Mean wind speed (mph) =	12 mph
M = Moisture content (%) =	15.0 %

Therefore,

PM Emission Factor =	0.0006 lbs/ton process
PM10 Emission Factor =	0.0002 lbs/ton process
PM2.5 Emission Factor=	0.00003 lbs/ton process

**2. Uncontrolled PTE of PM/PM10 emissions from storage piles:**

Max. Throughput Rate (worst case basis) =	480,000 (tons/year)	
PTE of PM (tons/year) =	435,000 tons/year * 0.0006 lbs/ton * 1 ton/2000 lbs =	<b>0.143</b>
PTE of PM10 (tons/year) =	435,000 tons/year * 0.0002 lbs/ton * 1 ton/2000 lbs =	<b>0.050</b>
PTE of PM2.5 (tons/year)=	435,000 tons/year * 0.00003 lbs/ton * 1 ton/2000 lbs =	<b>0.008</b>

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

**Company Name:** Bunge North America (East), LLC  
**Address City IN Zip:** 4743 County Road 28, Waterloo, Indiana 46793  
**Permit Number:** 033-36462-00004  
**Reviewer:** Deena Patton

**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)
Incoming Trucks (Empty)	1.0	11371.0	11371.0	12.0	136452.0	3.62	0.001	7.8	2845.5
Incoming Trucks (Full)	1.0	11371.0	11371.0	33.0	375243.0	3.62	0.001	7.8	2845.5
Outgoing Trucks (Empty)	1.0	1812.0	1812.0	13.5	24462.0	3.62	0.001	1.2	453.4
Outgoing Trucks (Full)	1.0	1812.0	1812.0	40.0	72480.0	3.62	0.001	1.2	453.4
<b>Totals</b>			<b>26366.0</b>		<b>608637.0</b>			<b>18.1</b>	<b>6598.0</b>

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

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	Update silt content value (if necessary) based on the specifics of the source
s =	6.0	6.0	6.0	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
a =	0.7	0.9	0.9	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
W =	23.1	23.1	23.1	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
b =	0.45	0.45	0.45	tons = average vehicle weight (provided by source)
				= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

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

Mitigated Emission Factor, Eext =  $E * [(365 - P)/365]$

where P =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	7.56	2.01	0.20	lb/mile
Mitigated Emission Factor, Eext =	4.97	1.32	0.13	lb/mile
Dust Control Efficiency =	50%	50%	50%	

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Incoming Trucks (Empty)	10.75	2.86	0.29	7.07	1.88	0.19	3.53	0.94	0.09
Incoming Trucks (Full)	10.75	2.86	0.29	7.07	1.88	0.19	3.53	0.94	0.09
Outgoing Trucks (Empty)	1.71	0.46	0.05	1.13	0.30	0.03	0.56	0.15	0.02
Outgoing Trucks (Full)	1.71	0.46	0.05	1.13	0.30	0.03	0.56	0.15	0.02
<b>Totals</b>	<b>24.93</b>	<b>6.64</b>	<b>0.66</b>	<b>16.39</b>	<b>4.37</b>	<b>0.44</b>	<b>8.19</b>	<b>2.18</b>	<b>0.22</b>

**Methodology**

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

**Abbreviations**

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

**Appendix A: Emission Calculations  
Particulate Emissions  
From Grain Receiving**

**Company Name:** Bunge North America (East), LLC  
**Address:** 4743 County Road 28, Waterloo, Indiana 46793  
**Permit No.:** 033-36462-00004  
**Reviewer:** Deena Patton

Based off Worst case between truck and rail.

Unit	Annual Throughput Rate (tons/year)	% of Annual Throughput Rate *	Emission Factor for PM (lbs/ton)	PTE of PM (tons/year)	Emission Factor for PM10 (lbs/ton)	PTE of PM10 (tons/year)	Emission Factor for PM2.5 (lbs/ton)	PTE of PM2.5 (tons/year)
Truck (F001) hopper bottom trucks	384,000	80%	0.035	<b>6.7</b>	0.008	<b>1.50</b>	0.001	<b>0.2496</b>
Truck (F001) straight trucks	96,000	20%	0.18	<b>8.6</b>	0.059	<b>2.83</b>	0.010	<b>0.48</b>
<b>Truck Total</b>				<b>15.4</b>		<b>4.33</b>		<b>0.7296</b>
Rail Car (F001)	880	na	0.032	<b>1.41E-02</b>	0.0078	<b>3.43E-03</b>	0.0013	<b>1.144</b>
<b>Total</b>				<b>15.36</b>		<b>4.330</b>		<b>1.144</b>

1. Emission factors are from AP-42, Table 9.9.1-1 Grain Elevators - Grain Receiving, SCC 3-02-005-05 (03/03).
2. The source receives grain by trucks with 80% being hopper bottom trucks and 20 % straight trucks.

\*Pursuant to AP42 Chapter 9.9.1 Grain Elevators and Processes, page 9.9.1-19 example 2, if a source receives grain by both straight and hopper bottom trucks, the emission factor should represent a conservative percentage of the distribution of straight and hopper bottom trucks normally handled at the facility. This source has given a conservative percentage of 80% by hopper bottom trucks and 20% by straight trucks.

**METHODOLOGY**

Rail Car (F001) PTE (tons/year) = Max. throughput rate (tons/year) \* Emission factor (lbs/ton) \* 1ton/2000 lbs

Truck (F001) PTE (tons/year) = Max. throughput rate (tons/year) \* % of Annual Throughput Rate \* Emission Factor (lbs/ton) \* 1ton/2000 lbs

**Appendix A: Emission Calculations  
PM and PM10 Emissions  
From the Existing Grain Elevator**

**Company Name: Bunge North America (East), LLC  
Address: 4743 County Road 28, Waterloo, IN 46793  
Permit No.: 033-36462-00004  
Reviewer: Deena Patton**

Note that the entire grain transfer, conveying, grain storage are enclosed. There are no open drop points.

**Potential to Emit PM/PM10/PM2.5**

Unit ID	Unit Description	Annual Throughput (tons/yr)	Uncontrolled PM Emission Factor (lbs/ton)	Uncontrolled PM10 Emission Factor (lbs/ton)	Uncontrolled PM2.5 Emission Factor (lbs/ton)	Control Method	Enclosure Efficiency** (%)	PTE of PM before Enclosure (tons/yr)	PTE of PM10 before Enclosure (tons/yr)	PTE of PM2.5 before Enclosure (tons/yr)	PTE of PM with Enclosure (tons/yr)	PTE of PM10 with Enclosure (tons/yr)	PTE of PM2.5 with Enclosure (tons/yr)
F002	Grain Transfer/Convey	1,056,000	0.006	0.0034	0.00058	internal design	0.0%	3.17	1.80	0.31	3.17	1.80	0.31
	Grain Cleaner	48,000	0.075	0.0190	0.0032			1.80	0.46	0.08	1.80	0.46	0.08
F003	Grain Storage Bin Vents	480,000	0.025	0.0063	0.0011	bin vents	0.0%	6.00	1.51	0.26	6.00	1.51	0.26
<b>Total</b>								<b>10.97</b>	<b>3.76</b>	<b>0.65</b>	<b>10.97</b>	<b>3.76</b>	<b>0.65</b>

Note: Emission factors are from AP-42, Chapter 9.9.1 - Grain Elevators, Table 9.9.1-1 (04/03).

PTE of PM/PM10/PM2.5 before Control (tons/yr) = Throughput Rate (tons/yr) x Uncontrolled Emission Factor (lbs/ton) x 1 ton/2000lbs

PTE of PM/PM10/PM2.5 after Control (tons/yr) = PTE of PM/PM10/PM2.5 before Control (tons/yr) x (1-Control Efficiency)

**Appendix A: Emission Calculations  
Particulate Emissions  
Zimmerman Grain Dryer**

**Company Name: Bunge North America (East), LLC  
Address: 4743 County Road 28, Waterloo, IN 46793  
Permit No.: 033-36462-00004  
Reviewer: Deena Patton**

Note that only corn is used in the grain dryer.  
Also, there is a bottleneck to the process in that the amount of grain that the facility can receive.

Unit	Annual Throughput Rate (tons/year)	Emission Factor for PM (lbs/ton)	PTE of PM (tons/year)	Emission Factor for PM10 (lbs/ton)	PTE of PM10 (tons/year)	Emission Factor for PM2.5 (lbs/ton)	PTE of PM2.5 (tons/year)
Grain Dryer (F005)	89,600	0.22	9.9	0.055	2.5	0.009	0.4

1. Emission factors are from AP-42, Table 9.9.1-1 Grain Elevators - Grain Drying (Column Dryer), SCC 3-02-005-27 (03/03).
2. Assume that the Permittee dries 100 % of all grain to derive worst case emissions.

**METHODOLOGY**

PTE (tons/year) = Max. throughput rate (tons/year) \* Emission factor (lbs/ton) \* 1ton/2000 lbs

Annual Throughpt Calculation (tons/year)

The dryer has a maximum capacity of 3,200,000 bushels per year

1 bushel of corn = 56 pounds

3,200,000 bushels per year \* 56 pounds/1bushel = 179200000 pounds per year

179200000 pounds per year \*1ton/2000 pounds = 89600 tons per year

326 IAC 6-3-2 Applicability		
E = 55.0*P^0.11-40	Process weight Rate (tons /year)	Process Weight Rate (tons/hour)
	89,600	10.23
		Rate of Emission (lbs/hour)
		31.030
Where		
E = Rate of emission in pounds per hour		
P = Process weight rate in tons per hour		

**Appendix A: Emission Calculations  
Natural Gas Combustion  
(MMBtu/hr > 100)  
From the One (1) Zimmerman Grain Dryer (GD)**

**Company Name: Bunge North America (East), LLC  
Address: 4743 County Road 28, Waterloo, IN 46793  
Permit No.: 033-36462-00004  
Reviewer: Deena Patton**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMSCF/yr<sup>1</sup>

108.0 (1 unit total)

203.3

	Pollutant					
Emission Factor in lbs/MMSCF	PM	PM10	SO <sub>2</sub>	*NO <sub>x</sub>	VOC	CO
	1.9	7.6	0.6	190	5.5	84.0
<b>Unlimited Potential to Emit in tons/yr</b>	<b>**</b>	<b>**</b>	<b>0.06</b>	<b>19.3</b>	<b>0.56</b>	<b>8.5</b>

\*Emission factors for NO<sub>x</sub>: Uncontrolled = 190 lb/MMSCF.

\*\* PM/PM10/PM2.5 emissions from the dryers are included in the emission calculations in page 4 of this appendix.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 3/98)

<sup>1</sup> Pursuant to the EPA Memorandum published on November 14, 1995 "Calculating Potential to Emit (PTE) and Other Guidance for Grain Handling Facilities" the potential to emit shall take in to account inherent operational limitations.

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMSCF = 1,000,000 Standard Cubic Feet of Gas

Potential Throughput (MMSCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Unlimited Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF) x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
PM and PM10 Emissions  
From Rail Loading Scale**

**Company Name: Bunge North America (East), LLC  
Address: 4743 County Road 28, Waterloo, IN 46793  
Permit No.: 033-36462-00004  
Reviewer: Deena Patton**

	Process Description	Control Device	Annual Throughput Rate (tons/year)	PM Emission Factor (lb/ton)	PM10 Emission Factor (lb/ton)	PM2.5 Emission Factor (lb/ton)	Control Efficiency	Uncontrolled PM (ton/yr)	Uncontrolled PM10 (ton/yr)	Uncontrolled PM2.5 (ton/yr)	Controlled PM (ton/yr)	Controlled PM10 (ton/yr)	Controlled PM2.5 (ton/yr)
	Rail Loading Scale (F006)	Baghouse	384,000	0.027	0.0022	0.00037	99%	5.18	0.42	0.07104	0.05	0.004224	0.0007104
	Rail Loading Scale (F007)	Baghouse	96,000	0.086	0.029	0.0049	99%	4.13	1.39	0.2352	0.041	0.01392	0.002352
Total								9.31	1.81	0.31	0.09	0.02	0.00

Emission Factors are from AP 42 Table 9.9.1-1 Grain Elevators - Grain Shipping SCC 3-02-005-63, SCC 3-02-005-60 (03/03)

Majority of the grain shipping takes place by rail car

**Methodology**

Uncontrolled PM (ton/yr) = Annual Throughput Rate (tons/yr) \* PM Emission Factor (lb/ton) / 2000 lbs

Uncontrolled PM10 (ton/yr) = Annual Throughput Rate (tons/yr) \* PM10 Emission Factor (lb/ton) / 2000 lbs

Uncontrolled PM2.5 (ton/yr) = Annual Throughput Rate (tons/yr) \* PM2.5 Emission Factor (lb/ton) / 2000 lbs

Controlled PM (ton/yr) = Uncontrolled PM (ton/yr) \* (1 - Control Efficiency %)

Controlled PM10 (ton/yr) = Uncontrolled PM10 (ton/yr) \* (1 - Control Efficiency %)

Controlled PM2.5 (ton/yr) = Uncontrolled PM2.5 (ton/yr) \* (1 - Control Efficiency %)



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**March 2, 2016**  
**Bunge North America (East), LLC**  
**033-36462-00004**

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

**Please Note:** *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at [PPEAR@IDEM.IN.GOV](mailto:PPEAR@IDEM.IN.GOV). If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure  
PN AAA Cover.dot 2/17/2016



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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

March 2, 2016

Dan Kramer  
Bunge North America (East), LLC  
4743 CR 28  
Waterloo, IN 46793

Re: Public Notice  
Bunge North America (East), LLC  
Permit Level: New Source Construction &  
Minor Source Operating Permit  
Permit Number: 033-36462-00004

Dear Mr. Kramer:

Enclosed is a copy of your draft New Source Construction, Minor Source Operating Permit, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Auburn Evening Star in Auburn, Indiana publish the abbreviated version of the public notice no later than March 7, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Waterloo Grant Township Public Library, 300 South Wayne Street in Waterloo, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Deena Patton, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5400 or dial (317) 234-5400.

Sincerely,

***Greg Hotopp***

Greg Hotopp  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

March 2, 2016

To: Waterloo Grant Township Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

**Applicant Name: Bunge North America (East), LLC**  
**Permit Number: 033-36462-00004**

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures  
PN Library.dot 2/17/2016



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**Michael R. Pence**  
*Governor*

**Carol S. Comer**  
*Commissioner*

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

March 2, 2016

Auburn Evening Star  
118 West Ninth Street  
Auburn, IN 46706

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Bunge North America (East), LLC, DeKalb County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than March 7, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

**To ensure proper payment, please reference account # 100174737.**

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Greg Hotopp at 800-451-6027 and ask for extension 3-3493 or dial 317-233-3493.

Sincerely,

*Greg Hotopp*

Greg Hotopp  
Permit Branch  
Office of Air Quality

Permit Level: New Source Construction & Minor Source Operating Permit  
Permit Number: 033-36462-00004

Enclosure

PN Newspaper.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	GHOTOPP 3/2/2016 Bunge North America (East). LLC 033-36462-00004 Draft		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
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1		Dan Kramer Bunge North America (East), LLC 4743 CR 28 Waterloo IN 46793-0697 (Source CAATS)										
2		Loren Polak Environmental Director Bunge North America (East), LLC PO Box 28500 St Louis MO 63146-1000 (RO CAATS)										
3		Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
4		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 (Affected Party)										
5		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 (Affected Party)										
6		DeKalb County Health Department 220 E 7th St #110 Auburn IN 46706 (Health Department)										
7		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
8		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 (Affected Party)										
9		Waterloo Town Council 280 N. Wayne St, P.O. Box 96 Waterloo IN 46793 (Local Official)										
10		Waterloo Grant TWP Public Library 300 S. Wayne St., P.O. Box 707 Waterloo IN 46793-4491 (Library)										
11		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 (Affected Party)										
12		CT Corporation System 251 E. Ohio Street Suite 1100 Indianapolis IN 46204 (Consultant)										
13		DeKalb County Building Department 301 S Union St Auburn IN 46706 (Local Official)										
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13			