Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Federally Enforceable State Operating Permit (FESOP)

for ADM Grain Company in Vanderburgh County

FESOP Renewal No.: F163-36835-00035

The Indiana Department of Environmental Management (IDEM) has received an application from ADM Grain Company located at 2730 Dixie Flyer Road, Evansville, Indiana for a renewal of its FESOP issued on January 4, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow ADM Grain Company to continue to operate its existing source.

This draft FESOP does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Evansville Vanderburgh Public Library
200 S. E. Martin Luther King Jr. Blvd
Evansville, IN 47713

and

IDEM Southwest Regional Office
1120 N. Vincennes Avenue
P.O. Box 128
Petersburg, IN 47567-0128

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 30th 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 F163-36835-00035 in all correspondence.

Comments should be sent to:

Donald McQuigg
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-4240
Or dial directly: (317) 234-4240
Fax: (317) 232-6749 attn: Donald McQuigg
E-mail: dmcquigg@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 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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

Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality

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Carol S. Comer
Commissioner

DRAFT

Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

ADM Grain Company
2730 Dixie Flyer Road
Evansville, Indiana 47712

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

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

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

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

Operation Permit No.: F163-36835-00035	
Issued by: Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary country grain elevator and a bulk material loading/unloading operation.

Source Address:	2730 Dixie Flyer Road, Evansville, Indiana 47712
General Source Phone Number:	(217) 424-5200
SIC Code:	5153 (Grain and Field Beans) and 4491 (Marine Cargo Handling)
County Location:	Vanderburgh
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 [326 IAC 2-8-3(c)(3)]

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

Grain Elevator Terminal Operations

(a) One (1) truck receiving pit, identified as Pit #1, with a maximum receiving throughput of 360 tons per hour (12,000 bushels per hour at 60 pounds per bushel), constructed in 1978 and using baghouse #1 for particulate control.

(b) One (1) truck receiving pit, identified as Pit #2, with a maximum receiving throughput of 360 tons per hour (12,000 bushels per hour at 60 pounds per bushel), constructed in 1978, reactivated in 2009, and using baghouse #1 for particulate control.

(c) One (1) enclosed internal grain handling operation, with a maximum throughput of 600,000 tons per year, constructed in 1978 and 2006, consisting of the following equipment, and using baghouses (#1 and #2) and exhausting to stacks (#1 and #2) for particulate control:

(1) One (1) conveyor, identified as High Roller Tank #4 fill conveyor, constructed in 2006, with a maximum throughput of 450 tons per hour.

(2) One (1) conveyor, identified as High Roller Tank #4 reclaim conveyor, constructed in 2006, with a maximum throughput of 450 tons per hour.

(3) One (1) drag conveyor, identified as Top Drag Tank A & B fill, constructed in 1978, with a maximum throughput of 450 tons per hour.

(4) One (1) reclaim conveyor, identified as Reclaim Drag, constructed in 1978, with a maximum throughput of 450 tons per hour.

(5) One (1) reclaim conveyor, identified as A & B Reclaim Drag, constructed in 1978, with a maximum throughput of 450 tons per hour.

(6) Three (3) reclaim screw conveyors, identified as Tank #1 Reclaim, Tank #2 Reclaim, and Tank #3 Reclaim, each conveyor unit was constructed in 1978. The maximum throughput of each conveyor unit is 180 tons per hour.

(7) One (1) reclaim conveyor, identified as Pit Reclaim, constructed in 1978, with a maximum throughput of 360 tons per hour.

(8) One (1) conveyor, identified as Leg #1, constructed in 1978, with a maximum throughput of 450 tons per hour.

(9) One (1) conveyor, identified as Leg #2, constructed in 1978, with a maximum throughput of 450 tons per hour.

(10) One (1) fill conveyor, identified as Bin #8 Fill Conveyor, constructed in 2011, with a maximum throughput of 600 tons per hour.

(11) One (1) reclaim conveyor, identified as Bin #8 Reclaim Conveyor, constructed in 2011, with a maximum throughput of 600 tons per hour.

Note: Grain can be shipped by truck, railcar, and/or barge. Grain byproducts and soybean byproducts are shipped by barge.

(d) One (1) truck (or rail) loadout area with a maximum throughput of 450 tons per hour, constructed in 1978, and using baghouse #2 for particulate control.

(e) One (1) barge loadout area with a maximum throughput of 450 tons per hour, constructed in 1978, and using baghouse #2 for particulate control.

(f) Eight (8) storage silos and bins, each with a vent, consisting of the following:

(1) One (1) storage silo, identified as Tank #1, constructed in 1978, with a maximum capacity of 3,000 tons.

(2) One (1) storage silo, identified as Tank #2, constructed in 1978, with a maximum capacity of 3,000 tons.

(3) One (1) storage silo, identified as Tank #3, constructed in 1978, with a maximum capacity of 3,000 tons.

(4) One (1) storage silo, identified as Tank #4, constructed in 2006, with a maximum capacity of 10,200 tons.

(5) Two (2) storage silos, identified as Tanks A and B, construction in 1978, with a maximum capacity of 600 tons each.

(6) One (1) storage silo, identified as Tank #6, constructed in 1978, with a maximum capacity of 150 tons.

(7) One (1) storage silo, identified as Bin #8, constructed in 2011, with a maximum capacity of 30,130 tons.

Note: The source will not be storing grain byproducts and soybean byproducts in the grain elevator.

(g) Unpaved haul roads, with fugitive dust controlled by oil emulsion application.

(h) One (1) open rectangular storage area equipped with concrete walls, constructed in 1999, for

storage of grain, coal, and/or salt, with maximum storage capacity of 11,900 tons per year.

(i) One (1) truck loadout spout in dump shed, with a maximum throughput of 600 tons per hour (20,000 bushels per hour at 60 pounds per bushel), constructed in 2011, and using a filter sock for particulate control.

(j) One (1) diesel fuel transfer and dispensing operation, constructed in 2009, with a maximum throughput of 5000 gallons of diesel fuel per month, equipped with one (1) double walled diesel fuel storage tank, constructed in 2014, with a maximum storage capacity of 500 gallons.

Bulk Products Terminal Operations

(l) One (1) bulk products receiving, transfer, storage, and shipping operation, handling grain, grain byproducts, corn gluten pellets, dried distillers grain and solubles (DDGS), soybean meal, cookie meal, coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, gypsum, dirt, wood chips, wood pellets, wood mulch, iron carbide, petroleum coke, magnetite, magnesium oxide, aluminum ingots, pig iron, paper products, scrap steel, and steel coils consisting of the following:

Note: Bulk products can be shipped by truck, railcar, and/or barge.

(A) One (1) barge unloading operation, consisting of the following:

(1) One (1) clamshell bucket crane, identified as A1, constructed in 2004 and permitted in 2011, for unloading bulk product barges and loading of the bulk receiving hopper A2, with maximum capacity of 600 tons per hour.

(2) One (1) bulk product receiving hopper, identified as A2, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(3) One (1) bulk product receiving conveyor, identified as A3, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(4) One (1) bulk product truck loading hopper, identified as A4, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(B) One (1) barge loading operation, consisting of the following:

(1) One (1) bulk product shipping hopper, identified as B1, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(2) One (1) bulk product shipping conveyor with barge loading spout, identified as B2, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(C) Storage, transfer, and transport of bulk products, consisting of the following:

(1) Transport of bulk products by trucks on unpaved roads.

(2) One (1) coal storage pile, identified as C2, with a maximum storage capacity of 25,000 tons, and a maximum truck unloading rate of 400 tons per hour.

(3) Transfer of bulk products by front-end loaders on unpaved roads, with a maximum transfer rate of 600 tons per hour.

(4) One (1) bulk product storage building, identified as C4, constructed in 2011, with a maximum floor storage area of 33,600 square feet. The storage

building can store any combination of bulk products, but will never store more than 800,000 bushels of grain or 90,000 tons of other bulk products.

(5) Three (3) bulk product storage building conveyors, identified as C5-1, C5-2, and C5-3, each constructed in 2011, each with a maximum capacity of 600 tons per hour.

(6) One (1) asphalt pad storage area, identified as C6, constructed in 2011, with a maximum storage capacity of 12,000 tons, and a maximum truck unloading rate of 200 tons per hour.

(7) Three (3) portable conveyors, each constructed in 2011, for loading and unloading of rail cars and trucks, and loading and unloading of storage piles, each with a maximum capacity of 600 tons per hour.

(D) One (1) barge unloading operation, consisting of the following:

(1) One (1) clamshell bucket crane, identified as D1, constructed in 2011, for unloading bulk product barges and loading of the bulk receiving hopper D2, with maximum capacity of 600 tons per hour.

(2) One (1) bulk product receiving hopper, identified as D2, constructed in 2011, with maximum capacity of 600 tons per hour.

(3) Five (5) bulk product conveyors, identified as D3-1 through D3-5, constructed in 2011, with maximum capacity of 600 tons per hour.

(m) One (1) emergency ground pile #1, constructed in 2015, with a capacity of two million (2,000,000) bushels, with a lime or asphalt base, with aeration, with walls for containment, and on the ground for no more than 180 days.

(n) One (1) emergency ground pile #2, constructed in 2015, with a capacity of five hundred thousand (560,000) bushels, with a lime or asphalt base, with aeration, with walls for containment, and on the ground for no more than 180 days.

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

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

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

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

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

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

(a) This permit, F163-36835-00035, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

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

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Southwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304**.**

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

(a) All terms and conditions of permits established prior to F163-36835-00035 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

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

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

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

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

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing

shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

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

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(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 [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

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

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

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

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of

operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

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

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

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

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

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

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

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

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

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

(b) The address for report submittal is:

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

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

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

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Grain Elevator Terminal Operations

(a) One (1) truck receiving pit, identified as Pit #1, with a maximum receiving throughput of 360 tons per hour (12,000 bushels per hour at 60 pounds per bushel), constructed in 1978 and using baghouse #1 for particulate control.

(b) One (1) truck receiving pit, identified as Pit #2, with a maximum receiving throughput of 360 tons per hour (12,000 bushels per hour at 60 pounds per bushel), constructed in 1978, reactivated in 2009, and using baghouse #1 for particulate control.

(c) One (1) enclosed internal grain handling operation, with a maximum throughput of 600,000 tons per year, constructed in 1978 and 2006, consisting of the following equipment, and using baghouses (#1 and #2) and exhausting to stacks (#1 and #2) for particulate control:

(1) One (1) conveyor, identified as High Roller Tank #4 fill conveyor, constructed in 2006, with a maximum throughput of 450 tons per hour.

(2) One (1) conveyor, identified as High Roller Tank #4 reclaim conveyor, constructed in 2006, with a maximum throughput of 450 tons per hour.

(3) One (1) drag conveyor, identified as Top Drag Tank A & B fill, constructed in 1978, with a maximum throughput of 450 tons per hour.

(4) One (1) reclaim conveyor, identified as Reclaim Drag, constructed in 1978, with a maximum throughput of 450 tons per hour.

(5) One (1) reclaim conveyor, identified as A & B Reclaim Drag, constructed in 1978, with a maximum throughput of 450 tons per hour.

(6) Three (3) reclaim screw conveyors, identified as Tank #1 Reclaim, Tank #2 Reclaim, and Tank #3 Reclaim, each conveyor unit was constructed in 1978. The maximum throughput of each conveyor unit is 180 tons per hour.

(7) One (1) reclaim conveyor, identified as Pit Reclaim, constructed in 1978, with a maximum throughput of 360 tons per hour.

(8) One (1) conveyor, identified as Leg #1, constructed in 1978, with a maximum throughput of 450 tons per hour.

(9) One (1) conveyor, identified as Leg #2, constructed in 1978, with a maximum throughput of 450 tons per hour.

(10) One (1) fill conveyor, identified as Bin #8 Fill Conveyor, constructed in 2011, with a maximum throughput of 600 tons per hour.

(11) One (1) reclaim conveyor, identified as Bin #8 Reclaim Conveyor, constructed in 2011, with a maximum throughput of 600 tons per hour.

Note: Grain can be shipped by truck, railcar, and/or barge. Grain by-products and soybean by-products are shipped by barge.

(d) One (1) truck (or rail) loadout area with a maximum throughput of 450 tons per hour, constructed in 1978, and using baghouse #2 for particulate control.

(e) One (1) barge loadout area with a maximum throughput of 450 tons per hour, constructed in 1978, and using baghouse #2 for particulate control.

(f) Eight (8) storage silos and bins, each with a vent, consisting of the following:

(1) One (1) storage silo, identified as Tank #1, constructed in 1978, with a maximum capacity of 3,000 tons.

(2) One (1) storage silo, identified as Tank #2, constructed in 1978, with a maximum capacity of 3,000 tons.

(3) One (1) storage silo, identified as Tank #3, constructed in 1978, with a maximum capacity of 3,000 tons.

(4) One (1) storage silo, identified as Tank #4, constructed in 2006, with a maximum capacity of 10,200 tons.

(5) Two (2) storage silos, identified as Tanks A and B, construction in 1978, with a maximum capacity of 600 tons each.

(6) One (1) storage silo, identified as Tank #6, constructed in 1978, with a maximum capacity of 150 tons.

(7) One (1) storage silo, identified as Bin #8, constructed in 2011, with a maximum capacity of 30,130 tons.

Note: The source will not be storing grain byproducts and soybean byproducts in the grain elevator.

(g) Unpaved haul roads, with fugitive dust controlled by oil emulsion application.

(h) One (1) open rectangular storage area equipped with concrete walls, constructed in 1999, for storage of grain, coal, and/or salt, with maximum storage capacity of 11,900 tons per year.

(i) One (1) truck loadout spout in dump shed, with a maximum throughput of 600 tons per hour (20,000 bushels per hour at 60 pounds per bushel), constructed in 2011, and using a filter sock 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 2-8-4(1)]

D.1.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1]

(a) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), the particulate matter (PM) emissions from the facilities listed below shall not exceed 0.03 grains per dry standard cubic foot (grains/dscf).

Emission Unit	Control Description	PM Emission Limit (grains/dscf)
Truck Receiving Pit #1	Baghouse #1	0.03
Truck Receiving Pit #2	Baghouse #1	0.03
High Roller Tank #4 Fill Conveyor	Enclosed	0.03
High Roller Tank #4 Reclaim Conveyor	Enclosed	0.03
Top Drag Tanks A & B Fill Conveyor	Enclosed	0.03
Reclaim Drag Conveyor	Enclosed	0.03
A & B Reclaim Drag Conveyor	Enclosed	0.03
Tank #1 Reclaim Conveyor	Enclosed	0.03
Tank #2 Reclaim Conveyor	Enclosed	0.03
Tank #3 Reclaim Conveyor	Enclosed	0.03
Pit Reclaim Conveyor	Enclosed	0.03
Leg #1 Conveyor	Enclosed	0.03
Leg #2 Conveyor	Enclosed	0.03
Bin #8 Fill Conveyor	Enclosed	0.03
Bin #8 Reclaim Conveyor	Enclosed	0.03
Truck (or Rail) Loadout: Grain	Baghouse #2	0.03
Barge Loadout: By-Product	Baghouse #2	0.03
Tank #1	None	0.03
Tank #2	None	0.03
Tank #3	None	0.03
Tank #4	None	0.03
Tank A	None	0.03
Tank B	None	0.03
Tank #6	None	0.03
Bin #8	None	0.03
Truck Loadout Spout in Dump Shed	Filter Sock	0.03

(b) Pursuant to 326 IAC 6.5-1-2(d)(2) (Particulate Matter Limitations Except Lake County), the Permittee shall comply with the following for operations associated with the grain elevator:

The Permittee shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

(1) Housekeeping practices shall be conducted as follows:

(A) Areas to be swept and maintained shall include, at a minimum, the following:

(i) General grounds, yard, and other open areas.

(ii) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.

(iii) Grain driers with respect to accumulated particulate matter.

(B) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.

(C) Dust from driveways, access roads, and other areas of travel shall be controlled.

(D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:

(A) Malfunctions.
(B) Breakdowns.
(C) Improper adjustment.
(D) Operating above the rated or designed capacity.
(E) Not following designed operating specifications.
(F) Lack of good preventive maintenance care.
(G) Lack of critical and proper spare replacement parts on hand.
(H) Lack of properly trained and experienced personnel.

(3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

D.1.2 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7(Part 70) not applicable, the Permittee shall comply with the following:

(a) The total amount of grain by-products and soybean by-products received at Truck Receiving Pits #1 and #2 shall be less than 230,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and

(b) PM_{10} emissions before control shall not exceed the following emission limitations:

Emission Unit	PM_{10} Emission Limit (lbs/ton)
Truck Receiving Pit #1	0.059
Truck Receiving Pit #2	0.059
High Roller Tank #4 Fill Conveyor	0.034
High Roller Tank #4 Reclaim Conveyor	0.034
Top Drag Tanks A & B Fill Conveyor	0.034
Reclaim Drag Conveyor	0.034
A & B Reclaim Drag Conveyor	0.034
Tank #1 Reclaim Conveyor	0.034
Tank #2 Reclaim Conveyor	0.034
Tank #3 Reclaim Conveyor	0.034
Pit Reclaim Conveyor	0.034
Leg #1 Conveyor	0.034
Leg #2 Conveyor	0.034
Bin #8 Fill Conveyor	0.034
Bin #8 Reclaim Conveyor	0.034
Truck (or Rail) Loadout: Grain	0.029
Truck Receiving Pit #1: By-Product	0.059
Internal Handling: By-Product	0.034
Barge Loadout: By-Product	0.004

Emission Unit	PM_{10} Emission Limit (lbs/ton)
Tank #1	0.0063
Tank #2	0.0063
Tank #3	0.0063
Tank #4	0.0063
Tank A	0.0063
Tank B	0.0063
Tank #6	0.0063
Bin #8	0.0063
Truck Loadout Spout in Dump Shed	0.029

Compliance with these limits, combined with the potential to emit PM_{10} from all other emission units at this source, shall limit the source-wide total potential to emit of PM_{10} to less than one hundred (100) tons per year and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the source.

D.1.3 Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-2]

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

(a) The total amount of grain by-products and soybean by-products received at Truck Receiving Pits #1 and #2 shall be less than 230,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and

(b) PM emissions before control shall not exceed the following emission limitations:

Emission Unit	PM Emission Limit (lbs/ton)
Truck Receiving Pit #1	0.18
Truck Receiving Pit #2	0.18
High Roller Tank #4 Fill Conveyor	0.061
High Roller Tank #4 Reclaim Conveyor	0.061
Top Drag Tanks A & B Fill Conveyor	0.061
Reclaim Drag Conveyor	0.061
A & B Reclaim Drag Conveyor	0.061
Tank #1 Reclaim Conveyor	0.061
Tank #2 Reclaim Conveyor	0.061
Tank #3 Reclaim Conveyor	0.061
Pit Reclaim Conveyor	0.061
Leg #1 Conveyor	0.061
Leg #2 Conveyor	0.061
Bin #8 Fill Conveyor	0.061
Bin #8 Reclaim Conveyor	0.061
Truck (or Rail) Loadout: Grain	0.086
Truck Receiving Pit #1: By-Product	0.18
Internal Handling: By-Product	0.061
Barge Loadout: By-Product	0.016

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

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.5 Particulate Control

(a) In order to comply with Condition D.1.1, the enclosures and baghouses associated with the emission units in Condition D.1.1 shall be in operation and control particulate emissions from their respective emission units at all times the emission units are in operation.

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

D.1.6 Broken or Failed Bag Detection

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

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

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

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

D.1.7 Visible Emissions Notations

(a) Daily visible emission notations of the baghouses (#1 and #2) stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

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

D.1.8 Parametric Monitoring

(a) The Permittee shall record the pressure drop across the baghouses (#1 and #2) used in conjunction with the receiving and loadout areas at least once per day when the receiving and loadout areas are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for each baghouse is a pressure drop of 0.5 and 4.5 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take a reasonable response shall be considered a deviation from this permit.

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

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

D.1.9 Record Keeping Requirement

(a) To document the compliance status with Conditions D.1.2(a) – FESOP Limit and D.1.3(a) - Prevention of Significant Deterioration (PSD) Minor Limits, the Permittee shall maintain records of the throughput of bulk materials through the Truck Receiving Pits # 1 and # 2.

(b) To document the compliance status with Condition D.1.7 - Visible Emissions Notations, the Permittee shall maintain records of daily visible emission notations of the baghouse (#1 and #2) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

(c) To document the compliance status with Condition D.1.8 - Parametric Monitoring, the Permittee shall maintain daily records of the pressure drop across the baghouses (#1 and #2). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

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

D.1.10 Reporting Requirement

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Bulk Products Terminal Operations

(l) One (1) bulk products receiving, transfer, storage, and shipping operation, handling grain, grain byproducts, corn gluten pellets, dried distillers grain and solubles (DDGS), soybean meal, cookie meal, coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, gypsum, dirt, wood chips, wood pellets, wood mulch, iron carbide, petroleum coke, magnetite, magnesium oxide, aluminum ingots, pig iron, paper products, scrap steel, and steel coils consisting of the following:

Note: Bulk products can be shipped by truck, railcar, and/or barge.

(A) One (1) barge unloading operation, consisting of the following:

(1) One (1) clamshell bucket crane, identified as A1, constructed in 2004 and permitted in 2011, for unloading bulk product barges and loading of the bulk receiving hopper A2, with maximum capacity of 600 tons per hour.

(2) One (1) bulk product receiving hopper, identified as A2, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(3) One (1) bulk product receiving conveyor, identified as A3, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(4) One (1) bulk product truck loading hopper, identified as A4, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(B) One (1) barge loading operation, consisting of the following:

(1) One (1) bulk product shipping hopper, identified as B1, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(2) One (1) bulk product shipping conveyor with barge loading spout, identified as B2, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(C) Storage, transfer, and transport of bulk products, consisting of the following:

(1) Transport of bulk products by trucks on unpaved roads.

(2) One (1) coal storage pile, identified as C2, with a maximum storage capacity of 25,000 tons, and a maximum truck unloading rate of 400 tons per hour.

(3) Transfer of bulk products by front-end loaders on unpaved roads, with a maximum transfer rate of 600 tons per hour.

(4) One (1) bulk product storage building, identified as C4, constructed in

2011, with a maximum floor storage area of 33,600 square feet. The storage building can store any combination of bulk products, but will never store more than 800,000 bushels of grain or 90,000 tons of other bulk products.

(5) Three (3) bulk product storage building conveyors, identified as C5-1, C5-2, and C5-3, each constructed in 2011, each with a maximum capacity of 600 tons per hour.

(6) One (1) asphalt pad storage area, identified as C6, constructed in 2011, with a maximum storage capacity of 12,000 tons, and a maximum truck unloading rate of 200 tons per hour.

(7) Three (3) portable conveyors, each constructed in 2011, for loading and unloading of rail cars and trucks, and loading and unloading of storage piles, each with a maximum capacity of 600 tons per hour.

(D) One (1) barge unloading operation, consisting of the following:

(1) One (1) clamshell bucket crane, identified as D1, constructed in 2011, for unloading bulk product barges and loading of the bulk receiving hopper D2, with maximum capacity of 600 tons per hour.

(2) One (1) bulk product receiving hopper, identified as D2, constructed in 2011, with maximum capacity of 600 tons per hour.

(3) Five (5) bulk product conveyors, identified as D3-1 through D3-5, constructed in 2011, with maximum capacity of 600 tons per hour.

(m) One (1) emergency ground pile #1, constructed in 2015, with a capacity of two million (2,000,000) bushels, with a lime or asphalt base, with aeration, with walls for containment, and on the ground for no more than 180 days.

(n) One (1) emergency ground pile #2, constructed in 2015, with a capacity of five hundred thousand (560,000) bushels, with a lime or asphalt base, with aeration, with walls for containment, and on the ground for no more than 180 days.

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

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

D.2.1 Particulate Matter Limitations except Lake County [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), the particulate matter (PM) emissions from each of the facilities listed below shall not exceed 0.03 grains per dry standard cubic foot (grains/dscf).

Emission Unit	Control Description	PM Emission Limit (grains/dscf)
Barge A receiving hopper A2	None	0.03
Barge A truck loading hopper A4	None	0.03
Conveyor transfer point C5-1	None	0.03
Conveyor transfer point C5-2	None	0.03
Conveyor transfer point C5-3	None	0.03

Emission Unit	Control Description	PM Emission Limit (grains/dscf)
Barge B receiving hopper B1	None	0.03
Barge D receiving hopper D2	None	0.03
Conveyor transfer point D3-1	None	0.03
Conveyor transfer point D3-2	None	0.03
Conveyor transfer point D3-3	None	0.03
Conveyor transfer point D3-4	None	0.03
Conveyor transfer point D3-5	None	0.03
Truck Unloading: Bulk Materials	None	0.03
Truck Loading: Bulk Materials	None	0.03
Rail Unloading: Bulk Materials	None	0.03
Rail Loading: Bulk Materials	None	0.03

D.2.2 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7(Part 70) not applicable, the Permittee shall comply with the following:

(a) PM10 emissions before control shall not exceed the following emission limitations:

Emission Unit	PM_{10} Emission Limit (lbs/ton)
Barge A receiving hopper A2	0.00077
Barge A truck loading hopper A4	0.00077
Conveyor transfer point C5-1	0.00077
Conveyor transfer point C5-2	0.00077
Conveyor transfer point C5-3	0.00077
Barge B receiving hopper B1	0.00077
Barge D receiving hopper D2	0.00077
Conveyor transfer point D3-1	0.00077
Conveyor transfer point D3-2	0.00077
Conveyor transfer point D3-3	0.00077
Conveyor transfer point D3-4	0.00077
Conveyor transfer point D3-5	0.00077
Truck Unloading: Bulk Materials	0.00077
Truck Loading: Bulk Materials	0.00077
Rail Unloading: Bulk Materials	0.00077
Rail Loading: Bulk Materials	0.00077

Compliance with these limits, combined with the potential to emit PM_{10} from all other emission units at this source, shall limit the source-wide total potential to emit of PM_{10} to less than one hundred (100) tons per year and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the source.

D.2.3 Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-2]

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

Emission Unit	PM Emission Limit (lbs/ton)
Barge A receiving hopper A2	0.0016
Barge A truck loading hopper A4	0.0016
Conveyor transfer point C5-1	0.0016
Conveyor transfer point C5-2	0.0016
Conveyor transfer point C5-3	0.0016
Barge B receiving hopper B1	0.0016
Barge D receiving hopper D2	0.0016
Conveyor transfer point D3-1	0.0016
Conveyor transfer point D3-2	0.0016
Conveyor transfer point D3-3	0.0016
Conveyor transfer point D3-4	0.0016
Conveyor transfer point D3-5	0.0016
Truck Unloading: Bulk Materials	0.0016
Truck Loading: Bulk Materials	0.0016
Rail Unloading: Bulk Materials	0.0016
Rail Loading: Bulk Materials	0.0016

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

D.2.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the facilities listed above. 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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, Indiana 47712
FESOP Permit No.: F163-36835-00035

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, Indiana 47712
FESOP Permit No.: F163-36835-00035

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

FESOP Quarterly Report

Source Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, Indiana 47712
FESOP Permit No.: F163-36835-00035
Facility: Truck Receiving Pits #1 and #2
Parameter: Grain By-Products and Soybean By-Products Received
Limit: The total amount of grain by-products and soybean by-products received at Truck Receiving Pits #1 and #2 shall be less than 230,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER:_____ YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	Grain Byproducts and Soybean By-Products Received (tons)	Grain Byproducts and Soybean By-Products Received (tons)	Grain Byproducts and Soybean By-Products Received (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone:_____

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

Source Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, Indiana 47712
FESOP Permit No.: F163-36835-00035

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Attachment A:

Fugitive Particulate Matter Emission Control Plan

ADM Grain Company
2730 Dixie Flyer Rd.
Evansville, IN 47712

FESOP Renewal No. 163-36835-00035

Fugitive Particulate Matter Emission Control Plan

1. **Name and Address of the source:**
   ADM Grain Company – Evansville
   2730 Dixie Flyer Road and 2720 Dixie Flyer Road
   Evansville, IN 47712

2. **Name and address of the owner or operator responsible for the execution of the control plan.**
   Same as above

3. **Identification of all processes, operation, and areas which have the potential to emit fugitive particulate matter:**
   Truck Receiving
   Internal Handling
   Truck Shipping
   Barge Loading and Unloading
   Storage Bin Vents
   Unpaved Roads
   Rail Loading and Unloading

4. **A map of the source showing aggregate pile areas, access areas around the aggregate pile, unpaved roads, paved roads, parking lots and location of conveyor and transfer points, etc.**
   This facility does not have any aggregate piles at this time. The facility could utilize a ground storage area for the one-turn storage of grain. This ground storage area is the temporary wall asphalt area noted on the attached map.

5. **The number a mix of vehicular activity occurring on paved roads, unpaved roads, and parking lots.**
   Heavy Duty Diesel Trucks will be delivering and receiving grain at the site. All roads on site are unpaved. There is no parking lot on site. Employees park in an area near the office.

6. **Type and quantity of material handled.**
   The current volumes for both locations combined are 275,000 tons grain and 715,000 tons bulk annually.

7. **Equipment used to maintain aggregate piles.**
   The facility does not have an aggregate pile at this time. However this facility has a ground storage area that is filled once per year with grain. The grain is placed in the area using a fill conveyor or track-hoe and removed from the ring using an end loader.

8. **A description of the measures to be implemented to control fugitive particulate matter emissions resulting from emission points identified in section 3.**
   The facility has implemented several measures to control fugitive dust at the facility: The truck receiving pits are enclosed. The internal handling system is enclosed. The plant has 2 dust systems to handle the shipping and receiving of the grain. The grain pile is covered with a tarp once it has been filled and will remain covered until the grain is removed from the pile. (See systems information below)

9. **A specification of the dust suppressant material, such as oil or chemical including estimated frequency of application rates and concentrations.**
   An oil emulsion has been applied on an as needed basis to the unpaved roadways.

10. **A specification of the particulate matter collection equipment used as a fugitive particulate matter emission control measure.**

    See systems information below.

11. **A schedule of compliance with the provisions of the control plan. Such schedule shall specify the amount of time the source requires to award any necessary contracts, commence and complete construction, installation, or modification of the fugitive particulate matter emission control measures.**
    The facility checks road conditions periodically and adds oil for fugitive PM suppression when necessary. Truck speed is restricted to 15 miles per hour.

12. **Other relevant data.**
    No other data.

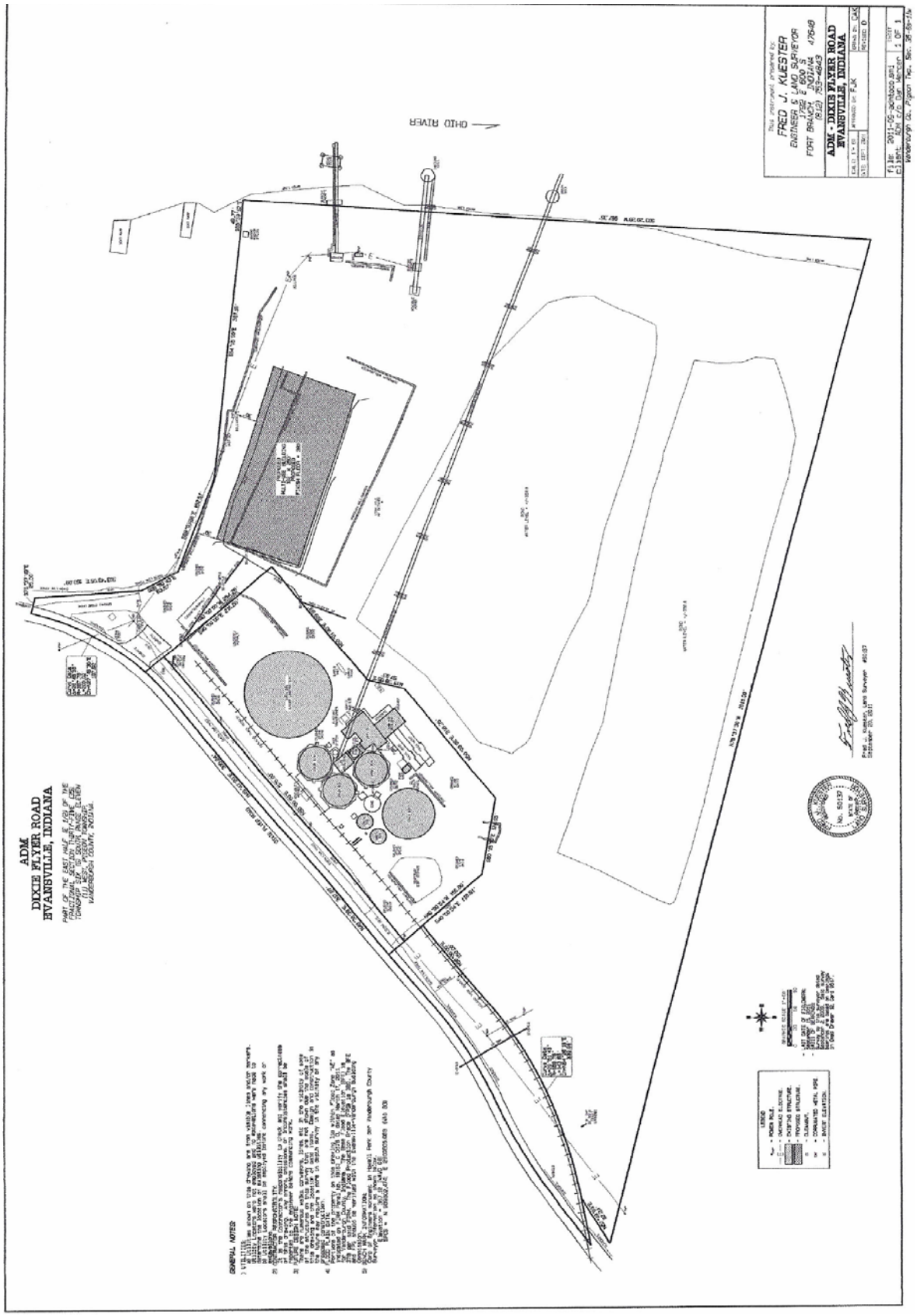
Systems Information

System # 1

Installation day - 1978
Number of bags per compartment - 144
Cleaning cycle – Continuous cleaning reverse air
Air to Cloth Ratio – 9.47
Gas Stream Flow Rate (inlet and outlet) - 30000 CFM
Gas Stream Temp (inlet and outlet) – Ambient
Gas Stream pressure (inches of water) (Range) - 0-10 P.S.I.G
Do you have a Preventative Maintenance Plan? - Read and record Mag gauges daily, Grease systems monthly, Change bags as needed.

System # 2

Installation day - 1978
Number of bags per compartment – 72
Cleaning cycle – Continuous cleaning reverse air
Air to Cloth Ratio – 10.52
Gas Stream Flow Rate (inlet and outlet) - 12500 CFM
Gas Stream Temp (inlet and outlet) – Ambient
Gas Stream pressure (inches of water) (Range) - 0-10 P.S.I.G
Do you have a Preventative Maintenance Plan? - Read and record Mag gauges daily, Grease systems monthly, Change bags as needed.


ADM
DIXIE FLYER ROAD
EVANSVILLE, INDIANA
OHIO RIVER
ADM - DIXIE FLYER ROAD
EVANSVILLE, INDIANA
FRED J. KUESTER
ENGINEER & LAND SURVEYOR
GENERAL NOTES

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	**ADM Grain Company**
Source Location:	**2730 Dixie Flyer Road, Evansville, Indiana 47712**
County:	**Vanderburgh**
SIC Code:	**5153 (Grain and Field Beans) and 4491 (Marine Cargo Handling)**
Permit Renewal No.:	**F163-36835-00035**
Permit Reviewer:	**Donald McQuigg**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from ADM Grain Company relating to the operation of a stationary country grain elevator and a bulk material loading/unloading operation**.** On February 12, 2016, ADM Grain Company submitted an application to the OAQ requesting to renew its operating permit. ADM Grain Company was issued a FESOP No. F163-30885-00035 on January 4, 2012.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

Grain Elevator Terminal Operations

(a) One (1) truck receiving pit, identified as Pit #1, with a maximum receiving throughput of 360 tons per hour (12,000 bushels per hour at 60 pounds per bushel), constructed in 1978 and using baghouse #1 for particulate control.

(b) One (1) truck receiving pit, identified as Pit #2, with a maximum receiving throughput of 360 tons per hour (12,000 bushels per hour at 60 pounds per bushel), constructed in 1978, reactivated in 2009, and using baghouse #1 for particulate control.

(c) One (1) enclosed internal grain handling operation, with a maximum throughput of 600,000 tons per year, constructed in 1978 and 2006, consisting of the following equipment, and using baghouses (#1 and #2) and exhausting to stacks (#1 and #2) for particulate control:

(1) One (1) conveyor, identified as High Roller Tank #4 fill conveyor, constructed in 2006, with a maximum throughput of 450 tons per hour.

(2) One (1) conveyor, identified as High Roller Tank #4 reclaim conveyor, constructed in 2006, with a maximum throughput of 450 tons per hour.

(3) One (1) drag conveyor, identified as Top Drag Tank A & B fill, constructed in 1978, with a maximum throughput of 450 tons per hour.

(4) One (1) reclaim conveyor, identified as Reclaim Drag, constructed in 1978, with a maximum throughput of 450 tons per hour.

(5) One (1) reclaim conveyor, identified as A & B Reclaim Drag, constructed in 1978, with a maximum throughput of 450 tons per hour.

(6) Three (3) reclaim screw conveyors, identified as Tank #1 Reclaim, Tank #2 Reclaim, and Tank #3 Reclaim, each conveyor unit was constructed in 1978. The maximum throughput of each conveyor unit is 180 tons per hour.

(7) One (1) reclaim conveyor, identified as Pit Reclaim, constructed in 1978, with a maximum throughput of 360 tons per hour.

(8) One (1) conveyor, identified as Leg #1, constructed in 1978, with a maximum throughput of 450 tons per hour.

(9) One (1) conveyor, identified as Leg #2, constructed in 1978, with a maximum throughput of 450 tons per hour.

(10) One (1) fill conveyor, identified as Bin #8 Fill Conveyor, constructed in 2011, with a maximum throughput of 600 tons per hour.

(11) One (1) reclaim conveyor, identified as Bin #8 Reclaim Conveyor, constructed in 2011, with a maximum throughput of 600 tons per hour.

Note: Grain can be shipped by truck, railcar, and/or barge. Grain byproducts and soybean byproducts are shipped by barge.

(d) One (1) truck (or rail) loadout area with a maximum throughput of 450 tons per hour, constructed in 1978, and using baghouse #2 for particulate control.

(e) One (1) barge loadout area with a maximum throughput of 450 tons per hour, constructed in 1978, and using baghouse #2 for particulate control.

(f) Eight (8) storage silos and bins, each with a vent, consisting of the following:

(1) One (1) storage silo, identified as Tank #1, constructed in 1978, with a maximum capacity of 3,000 tons.

(2) One (1) storage silo, identified as Tank #2, constructed in 1978, with a maximum capacity of 3,000 tons.

(3) One (1) storage silo, identified as Tank #3, constructed in 1978, with a maximum capacity of 3,000 tons.

(4) One (1) storage silo, identified as Tank #4, constructed in 2006, with a maximum capacity of 10,200 tons.

(5) Two (2) storage silos, identified as Tanks A and B, construction in 1978, with a maximum capacity of 600 tons each.

(6) One (1) storage silo, identified as Tank #6, constructed in 1978, with a maximum capacity of 150 tons.

(7) One (1) storage silo, identified as Bin #8, constructed in 2011, with a maximum capacity of 30,130 tons.

Note: The source will not be storing grain byproducts and soybean byproducts in the grain elevator.

(g) Unpaved haul roads, with fugitive dust controlled by oil emulsion application.

(h) One (1) open rectangular storage area equipped with concrete walls, constructed in 1999, for storage of grain, coal, and/or salt, with maximum storage capacity of 11,900 tons per year.

(i) One (1) truck loadout spout in dump shed, with a maximum throughput of 600 tons per hour (20,000 bushels per hour at 60 pounds per bushel), constructed in 2011, and using a filter sock for particulate control.

(j) One (1) diesel fuel transfer and dispensing operation, constructed in 2009, with a maximum throughput of 5000 gallons of diesel fuel per month, equipped with one (1) double walled diesel fuel storage tank, constructed in 2014, with a maximum storage capacity of 500 gallons.

Bulk Products Terminal Operations

(l) One (1) bulk products receiving, transfer, storage, and shipping operation, handling grain, grain by-products, corn gluten pellets, dried distillers grain and solubles (DDGS), soybean meal, cookie meal, coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, gypsum, dirt, wood chips, wood pellets, wood mulch, iron carbide, petroleum coke, magnetite, magnesium oxide, aluminum ingots, pig iron, paper products, scrap steel, and steel coils consisting of the following:

Note: Bulk products can be shipped by truck, railcar, and/or barge.

(A) One (1) barge unloading operation, consisting of the following:

(1) One (1) clamshell bucket crane, identified as A1, constructed in 2004 and permitted in 2011, for unloading bulk product barges and loading of the bulk receiving hopper A2, with maximum capacity of 600 tons per hour.

(2) One (1) bulk product receiving hopper, identified as A2, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(3) One (1) bulk product receiving conveyor, identified as A3, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(4) One (1) bulk product truck loading hopper, identified as A4, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(B) One (1) barge loading operation, consisting of the following:

(1) One (1) bulk product shipping hopper, identified as B1, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(2) One (1) bulk product shipping conveyor with barge loading spout, identified as B2, constructed in 2004 and permitted in 2011, with maximum capacity of 600 tons per hour.

(C) Storage, transfer, and transport of bulk products, consisting of the following:

(1) Transport of bulk products by trucks on unpaved roads.

(2) One (1) coal storage pile, identified as C2, with a maximum storage capacity of 25,000 tons, and a maximum truck unloading rate of 400 tons per hour.

(3) Transfer of bulk products by front-end loaders on unpaved roads, with a maximum transfer rate of 600 tons per hour.

(4) One (1) bulk product storage building, identified as C4, constructed in 2011, with a maximum floor storage area of 33,600 square feet. The storage building can store any combination of bulk products, but will never store more than 800,000 bushels of grain or 90,000 tons of other bulk products.

(5) Three (3) bulk product storage building conveyors, identified as C5-1, C5-2, and C5-3, each constructed in 2011, each with a maximum capacity of 600 tons per hour.

(6) One (1) asphalt pad storage area, identified as C6, constructed in 2011, with a maximum storage capacity of 12,000 tons, and a maximum truck unloading rate of 200 tons per hour.

(7) Three (3) portable conveyors, each constructed in 2011, for loading and unloading of rail cars and trucks, and loading and unloading of storage piles, each with a maximum capacity of 600 tons per hour.

(D) One (1) barge unloading operation, consisting of the following:

(1) One (1) clamshell bucket crane, identified as D1, constructed in 2011, for unloading bulk product barges and loading of the bulk receiving hopper D2, with maximum capacity of 600 tons per hour.

(2) One (1) bulk product receiving hopper, identified as D2, constructed in 2011, with maximum capacity of 600 tons per hour.

(3) Five (5) bulk product conveyors, identified as D3-1 through D3-5, constructed in 2011, with maximum capacity of 600 tons per hour.

(m) One (1) emergency ground pile #1, constructed in 2015, with a capacity of two million (2,000,000) bushels, with a lime or asphalt base, with aeration, with walls for containment, and on the ground for no more than 180 days.

(n) One (1) emergency ground pile #2, constructed in 2015, with a capacity of five hundred thousand (500,000) bushels, with a lime or asphalt base, with aeration, with walls for containment, and on the ground for no more than 180 days.

Insignificant Activities

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

Existing Approvals

Since the issuance of the FESOP No; F163-30885-00035 on January 4, 2012, the source has constructed or has been operating under the following additional approvals:

(a) Administrative Amendment No. 163-33793-00035 issued on December 30, 2013;

(b) Minor Permit Revision No. 163-35084-00035 issued on December 11, 2014; and

(c) Administrative Amendment No. 163-36263-00035 issued on October 22, 2015.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Attainment effective October 27, 2011, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.

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

(b) $PM_{2.5}$
Vanderburgh County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Vanderburgh County has been classified as attainment or unclassifiable in Indiana for SO_2, CO, PM_{10}, and NO_2. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year[(1)]
PM	651.4
PM_{10}	254.6
$PM_{2.5}$	42.4
SO_2	-
NO_x	-
VOC	negl
CO	-
Worst Single HAP	negl
Total HAP	negl

negl. = negligible
"-" denotes the source has no emissions of the specified pollutant

(1) The potential to emit reported is only for non-fugitive sources of emissions, since fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

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

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM_{10} is equal to or greater than one hundred (100) tons per year. However, the Permittee has agreed to limit the source's PM_{10} emissions to less than Title V levels; therefore, the Permittee will be issued a FESOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all other criteria pollutants are each less than one hundred (100) tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year.

Potential to Emit After Issuance

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

	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
Emission Unit/ Non-Fugitive Emissions	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	Total HAPs	Worst Single HAP
Grain									
Receiving Pit #1 (straight truck)	27.00	8.85	1.50	-	-	-	-	-	-
Receiving Pit #2 (straight truck)				-	-	-	-	-	-
Grain internal handling step 1	9.15	5.10	0.87	-	-	-	-	-	-
Grain internal handling step 2	9.15	5.10	0.87	-	-	-	-	-	-
Grain truck loadout	12.90	4.35	0.74	-	-	-	-	-	-
Grain storage	3.75	0.95	0.17	-	-	-	-	-	-
Grain and Soybean By-Products****									
Receiving Pit #1 (straight truck)	20.70	6.79	1.15	-	-	-	-	-	-
Receiving Pit #2 (straight truck)				-	-	-	-	-	-
Internal handling step 1	7.02	3.91	0.67	-	-	-	-	-	-
Barge loadout	1.84	0.46	0.06	-	-	-	-	-	-
Bulk Products Handling									
Barge A receiving hopper A2	4.29	2.03	0.31	-	-	-	-	-	-
Conveyor transfer point C5-1	4.29	2.03	0.31	-	-	-	-	-	-
Conveyor transfer point C5-2	4.29	2.03	0.31	-	-	-	-	-	-
Conveyor transfer point C5-3	4.29	2.03	0.31	-	-	-	-	-	-
Barge B receiving hopper A2	4.29	2.03	0.31	-	-	-	-	-	-
Barge D receiving hopper D2	4.29	2.03	0.31	-	-	-	-	-	-
Conveyor transfer point D3-1	4.29	2.03	0.31	-	-	-	-	-	-
Conveyor transfer point D3-2	4.29	2.03	0.31	-	-	-	-	-	-
Conveyor transfer point D3-3	4.29	2.03	0.31	-	-	-	-	-	-
Conveyor transfer point D3-4	4.29	2.03	0.31	-	-	-	-	-	-
Conveyor transfer point D3-5	4.29	2.03	0.31	-	-	-	-	-	-
Bulk products truck unloading	4.29	2.03	0.31	-	-	-	-	-	-
Bulk products truck loading	4.29	2.03	0.31	-	-	-	-	-	-
Bulk products rail unloading	4.29	2.03	0.31	-	-	-	-	-	-
Bulk products rail loading	4.29	2.03	0.31	-	-	-	-	-	-
Emergency Bulk Product Storage Piles									

Emission Unit/ Non-Fugitive Emissions	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	Total HAPs	Worst Single HAP
Pile #1 internal handling step 1	1.83	1.02	0.17	-	-	-	-	-	-
Pile #1 internal handling step 2	1.83	1.02	0.17	-	-	-	-	-	-
Pile #1 grain shipping - truck	2.58	0.87	0.15	-	-	-	-	-	-
Pile #2 grain handling step 1	0.46	0.26	0.04	-	-	-	-	-	-
Pile #2 grain handling step 2	0.46	0.26	0.04	-	-	-	-	-	-
Pile #2 grain shipping - truck	0.65	0.22	0.04	-	-	-	-	-	-
Diesel Fuel Storage, Transfer, and Dispensing	-	-	-	-	-	negl	-	negl	-
Total PTE (Non-Fugitive)	**168.0**	**71.6**	**11.6**	**-**	**-**	**negl**	**-**	**negl**	**-**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	NA	NA
Fugitive Emissions* **									
Bulk Product Handling (fugitive)	30.05	14.21	2.15	-	-	-	-	-	-
Open Rectangular Storage Area (receiving and shipping)	1.58	0.52	0.09	-	-	-	-	-	-
Storage Piles	0.73	0.26	0.26	-	-	-	-	-	-
Unpaved Roads	169.72	43.26	4.33	-	-	-	-	-	-
Emergency storage: pile 1 and 2 (storage pile uncovered)	0.12	0.04	0.04	-	-	-	-	-	-
Total PTE (Fugitive)	**202.9**	**58.5**	**7.1**	**-**	**-**	**-**	**-**	**-**	**-**
Total PTE of Entire Source (Non-Fugitive and Fugitive)	**370.9**	**130.2**	**18.7**	**-**	**-**	**negl**	**-**	**negl**	**-**

negl. = negligible, <0.1 tons/yr; "-" denotes emission unit does not emit the designated pollutant; NA = not applicable
* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
***Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 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 and Part 70 Permit applicability. Emissions in this table are emissions before control.
****The total amount of grain byproducts and soybean byproducts received at Truck Receiving Pits #1 and #2 shall be less than 230,000 tons per twelve (12) consecutive month period to render 326 IAC 2-7 and 326 IAC 2-2 not applicable.

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

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

New Source Performance Standards (NSPS)

(b) 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 renewal for the emission units constructed after August 3, 1978, because this grain elevator does not have a permanent storage capacity (grain storage capacity which is inside a building, bin, or silo; and excluding the two (2) emergency storage piles) of more than 2.5 million bushels. The permanent storage capacity of the source is 2,489,333 U.S. bushels.

(c) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in this permit renewal.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDD are not included in this permit renewal because the facilities at this source are not considered a prepared feeds manufacturing facility as defined by 40 CFR 63.11627. This source does not manufacture animal feed. This source only consists of a country grain elevator and a bulk material loading/unloading operation.

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

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)
The source is subject to 326 IAC 1-5-2. The emergency reduction plan was received by IDEM on May 9, 2014

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
The source is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 (Prevention of Significant Deterioration). Although the source has an uncontrolled potential to emit in excess of two hundred fifty (250) tons per year of PM, the source has agreed to limit the PTE of PM to less than two hundred fifty (250) tons per year.

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

(a) The total amount of grain byproducts and soybean byproducts received at Truck Receiving Pits #1 and #2 shall be less than 230,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and

(b) The PM emissions shall not exceed the following emission limitations:

Emission Unit	PM Emission Limit (lbs/ton)
Truck Receiving Pit #1	0.18
Truck Receiving Pit #2	0.18
High Roller Tank #4 Fill Conveyor	0.061
High Roller Tank #4 Reclaim Conveyor	0.061
Top Drag Tanks A & B Fill Conveyor	0.061
Reclaim Drag Conveyor	0.061
A & B Reclaim Drag Conveyor	0.061
Tank #1 Reclaim Conveyor	0.061
Tank #2 Reclaim Conveyor	0.061
Tank #3 Reclaim Conveyor	0.061
Pit Reclaim Conveyor	0.061
Leg #1 Conveyor	0.061
Leg #2 Conveyor	0.061
Bin #8 Fill Conveyor	0.061
Bin #8 Reclaim Conveyor	0.061
Truck (or Rail) Loadout: Grain	0.086
Truck Receiving Pit #1: By-Product	0.18
Internal Handling: By-Product	0.061
Barge Loadout: By-Product	0.016
Tank #1	0.025
Tank #2	0.025
Tank #3	0.025
Tank #4	0.025
Tank A	0.025
Tank B	0.025
Tank #6	0.025
Bin #8	0.025
Truck Loadout Spout in Dump Shed	0.086
Barge A receiving hopper A2	0.0016
Barge A truck loading hopper A4	0.0016
Conveyor transfer point C5-1	0.0016

Emission Unit	PM Emission Limit (lbs/ton)
Conveyor transfer point C5-2	0.0016
Conveyor transfer point C5-3	0.0016
Barge B receiving hopper B1	0.0016
Barge D receiving hopper D2	0.0016
Conveyor transfer point D3-1	0.0016
Conveyor transfer point D3-2	0.0016
Conveyor transfer point D3-3	0.0016
Conveyor transfer point D3-4	0.0016
Conveyor transfer point D3-5	0.0016
Truck Unloading: Bulk Materials	0.0016
Truck Loading: Bulk Materials	0.0016
Rail Unloading: Bulk Materials	0.0016
Rail Loading: Bulk Materials	0.0016

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

326 IAC 2-8-4 (FESOP)
The uncontrolled PM_{10} emissions are greater than one hundred (100) tons per year for this source. Therefore, a federally enforceable limit for PM_{10} emissions shall be established for this source. Pursuant to this rule, the amount of PM_{10} shall be limited to less than one hundred (100) tons per year.

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

(a) The total amount of grain by-products and soybean by-products received at Truck Receiving Pits #1 and #2 shall be less than 230,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and

(b) The PM_{10} emissions shall not exceed the following emission limitations:

Emission Unit	PM_{10} Emission Limit (lbs/ton)
Truck Receiving Pit #1	0.059
Truck Receiving Pit #2	0.059
High Roller Tank #4 Fill Conveyor	0.034
High Roller Tank #4 Reclaim Conveyor	0.034
Top Drag Tanks A & B Fill Conveyor	0.034
Reclaim Drag Conveyor	0.034
A & B Reclaim Drag Conveyor	0.034
Tank #1 Reclaim Conveyor	0.034
Tank #2 Reclaim Conveyor	0.034
Tank #3 Reclaim Conveyor	0.034
Pit Reclaim Conveyor	0.034
Leg #1 Conveyor	0.034

Emission Unit	PM_{10} Emission Limit (lbs/ton)
Leg #2 Conveyor	0.034
Bin #8 Fill Conveyor	0.034
Bin #8 Reclaim Conveyor	0.034
Truck (or Rail) Loadout: Grain	0.029
Truck Receiving Pit #1: By-Product	0.059
Internal Handling: By-Product	0.034
Barge Loadout: By-Product	0.004
Tank #1	0.0063
Tank #2	0.0063
Tank #3	0.0063
Tank #4	0.0063
Tank A	0.0063
Tank B	0.0063
Tank #6	0.0063
Bin #8	0.0063
Truck Loadout Spout in Dump Shed	0.029
Barge A receiving hopper A2	0.00077
Barge A truck loading hopper A4	0.00077
Conveyor transfer point C5-1	0.00077
Conveyor transfer point C5-2	0.00077
Conveyor transfer point C5-3	0.00077
Barge B receiving hopper B1	0.00077
Barge D receiving hopper D2	0.00077
Conveyor transfer point D3-1	0.00077
Conveyor transfer point D3-2	0.00077
Conveyor transfer point D3-3	0.00077
Conveyor transfer point D3-4	0.00077
Conveyor transfer point D3-5	0.00077
Truck Unloading: Bulk Materials	0.00077
Truck Loading: Bulk Materials	0.00077
Rail Unloading: Bulk Materials	0.00077
Rail Loading: Bulk Materials	0.00077

Compliance with these limits, combined with the potential to emit PM_{10} from all other emission units at this source, shall limit the source-wide total potential to emit of PM_{10} to less than one hundred (100) tons per year and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the source.

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than five (5) tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2)

326 IAC 6.5 (PM Limitations Except Lake County)
This source is subject to 326 IAC 6.5 because it is located in Vanderburgh County, its PM PTE (or limited PM PTE) is equal to or greater than one hundred (100) tons/year or actual emissions are greater than ten (10) tons/year. However, this source is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Therefore, 326 IAC 6.5-1-2 applies.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), 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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
Pursuant to 326 IAC 6-5-1(a) and 326 IAC 6-5-1(a)(2)(E), this source is subject to the requirements of 326 IAC 6-5, it has potential fugitive particulate emissions greater than twenty-five (25) tons per year and it is located in the City of Evansville (Vanderburgh County). Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, submitted on September 22, 2011, which is included as Attachment A to the operating permit.

State Rule Applicability – Individual Facilities

Grain Elevator Terminal Operations

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
(a) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the facilities listed below shall not exceed 0.03 grains per dry standard cubic foot (grains/dscf).

Emission Unit	Control Description	PM Emission Limit (grains/dscf)
Truck Receiving Pit #1 & Pit #2	Baghouse #1	0.03
High Roller Tank #4 Fill Conveyor	Enclosed	0.03
High Roller Tank #4 Reclaim Conveyor	Enclosed	0.03
Top Drag Tanks A & B Fill Conveyor	Enclosed	0.03
Reclaim Drag Conveyor	Enclosed	0.03
A & B Reclaim Drag Conveyor	Enclosed	0.03
Tank #1 Reclaim Conveyor	Enclosed	0.03
Tank #2 Reclaim Conveyor	Enclosed	0.03
Tank #3 Reclaim Conveyor	Enclosed	0.03
Pit Reclaim Conveyor	Enclosed	0.03
Leg #1 Conveyor	Enclosed	0.03
Leg #2 Conveyor	Enclosed	0.03
Bin #8 Fill Conveyor	Enclosed	0.03
Bin #8 Reclaim Conveyor	Enclosed	0.03
Truck (or Rail) Loadout: Grain	Baghouse #2	0.03
Barge Loadout: By-Product	Baghouse #2	0.03
Tank #1	None	0.03
Tank #2	None	0.03
Tank #3	None	0.03
Tank #4	None	0.03
Tank A	None	0.03

Emission Unit	Control Description	PM Emission Limit (grains/dscf)
Tank B	None	0.03
Tank #6	None	0.03
Bin #8	None	0.03
Truck Loadout Spout in Dump Shed	Filter Sock	0.03

(b) Pursuant to 326 IAC 6.5-1-2(d) (Particulate Matter Limitations Except Lake County), the Permittee shall comply with the housekeeping and maintenance requirements specified in 326 IAC 6.5-1-2(d)(2) for the operations associated with the grain elevator.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply to a facility if a particulate limitation established in 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) is more stringent than the particulate limitation established in 326 IAC 6-3-2. Since the particulate limitation established by 326 IAC 6.5-1-2 for each facility is more stringent than the particulate limitations that would be established by 326 IAC 6-3-2, these facilities are not subject to the requirements of 326 IAC 6-3-2.

Bulk Products Terminal Operations

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the facilities below shall not exceed 0.03 grains per dry standard cubic foot (grains/dscf).

Emission Unit	Control Description	PM Emission Limit (grains/dscf)
By-Products Receiving -Truck Pit #1 & Pit #2	Baghouse #1	0.03
By-Products Internal Handling Step 1	Enclosed	0.03
By-Products Barge Loadout	Baghouse No. 2	0.03
Barge A Receiving Hopper A2	None	0.03
Conveyor Transfer Point A3	None	0.03
Conveyor Transfer Point C5-1	None	0.03
Conveyor Transfer Point C5-2	None	0.03
Conveyor Transfer Point C5-3	None	0.03
Barge B Receiving Hopper B1	None	0.03
Barge D Receiving Hopper D2	None	0.03
Conveyor Transfer Point D3-1	None	0.03
Conveyor Transfer Point D3-2	None	0.03
Conveyor Transfer Point D3-3	None	0.03
Conveyor Transfer Point D3-4	None	0.03
Conveyor Transfer Point D3-5	None	0.03
Truck Unloading: Bulk Materials	None	0.03
Truck Loading: Bulk Materials	None	0.03
Rail Unloading: Bulk Materials	None	0.03
Rail Loading: Bulk Materials	None	0.03

Diesel Fuel Storage Tank and Dispensing Facility

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the diesel fuel storage and dispensing operation will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The diesel fuel storage and dispensing facilities are not subject to the requirements of 326 IAC 8-1-6 because the unlimited VOC potential emissions from each unit are less than twenty-five (25) tons per year.

326 IAC 8-4-3 (Petroleum Sources; Petroleum Liquid Storage Facilities)
Pursuant to 326 IAC 8-4-1(c) and 326 IAC 8-4-3(a), the deisel fuel storage vessel is not subject to the requirements of 326 IAC 8-4-3 because the diesel fuel storage tank (constructed in 2009, 500 gallon capacity), which was constructed after January 1, 1980, has a storage capacity less than thirty-nine thousand (39,000) gallons and stores diesel fuel which has a true vapor pressure less than 1.52 psi at the storage temperature.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

(a) Baghouses #1 and #2 have applicable compliance monitoring conditions as specified below:

Emission Units	Control	Parameter	Frequency	Range	Excursions and Exceedances
Truck Receiving Pits #1 and #2	Baghouse #1	Water Pressure Drop	Daily	0.5 to 4.5 inches of water	Response Steps
		Visible Emissions		Normal-Abnormal	
Truck/Rail Loadout and Barge Loadout	Baghouse #2	Water Pressure Drop	Daily	0.5 to 4.5 inches of water	Response Steps
		Visible Emissions		Normal-Abnormal	

These monitoring conditions are necessary because baghouses #1 and #2 used for particulate control for the truck receiving facilities and truck/rail/barge loadout facilities must operate properly to ensure compliance with 326 IAC 5-1 (Opacity Limitations), 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), and 326 IAC 2-8 (FESOP) .

Recommendation

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

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

An application for the purposes of this review was received on February 12, 2016.

Conclusion

The operation of this stationary country grain elevator and a bulk material loading/unloading operation shall be subject to the conditions of the attached FESOP Renewal No. F163-36835-00035.

IDEM Contact

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

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

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

TSD Appendix A: Emission Calculations
Non-Fugitive Emission Unit Emissions Summary

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

	Potential to Emit (PTE) after Issuance (tons/year)*									
Process Description	PM	PM_{10}	$PM_{2.5}$	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Grain[1]										
Grain Receiving (Straight Truck) - Receiving Pit #1	27.00	8.85	1.50	-	-	-	-	-	-	-
Grain Receiving (Straight Truck) - Receiving Pit #2				-	-	-	-	-	-	-
Grain Internal Handling Step 1	9.15	5.10	0.87	-	-	-	-	-	-	-
Grain Internal Handling Step 2	9.15	5.10	0.87	-	-	-	-	-	-	-
Grain Truck Loadout	12.90	4.35	0.74	-	-	-	-	-	-	-
Grain Storage	3.75	0.95	0.17	-	-	-	-	-	-	-
Grain and Soybean By-Products[2]										
Grain and Soybean By-Product Receiving (Straight Truck) - Receiving Pit #1	20.70	6.79	1.15	-	-	-	-	-	-	-
Grain and Soybean By-Product Receiving (Straight Truck) - Receiving Pit #2				-	-	-	-	-	-	-
Grain and Soybean By-Products Internal Handling Step 1	7.02	3.91	0.67	-	-	-	-	-	-	-
Grain and Soybean By-Products Barge Loadout	1.84	0.46	0.06	-	-	-	-	-	-	-
Bulk Products Handling[3]										
Barge A Receiving Hopper A2	4.29	2.03	0.31	-	-	-	-	-	-	-
Conveyor Transfer Point A3	4.29	2.03	0.31	-	-	-	-	-	-	-
Conveyor Transfer Point C5-1	4.29	2.03	0.31	-	-	-	-	-	-	-
Conveyor Transfer Point C5-2	4.29	2.03	0.31	-	-	-	-	-	-	-
Conveyor Transfer Point C5-3	4.29	2.03	0.31	-	-	-	-	-	-	-
Barge B Receiving Hopper B1	4.29	2.03	0.31	-	-	-	-	-	-	-
Barge D Receiving Hopper D2	4.29	2.03	0.31	-	-	-	-	-	-	-
Conveyor Transfer Point D3-1	4.29	2.03	0.31	-	-	-	-	-	-	-
Conveyor Transfer Point D3-2	4.29	2.03	0.31	-	-	-	-	-	-	-
Conveyor Transfer Point D3-3	4.29	2.03	0.31	-	-	-	-	-	-	-
Conveyor Transfer Point D3-4	4.29	2.03	0.31	-	-	-	-	-	-	-
Conveyor Transfer Point D3-5	4.29	2.03	0.31	-	-	-	-	-	-	-
Bulk Products Truck Unloading	4.29	2.03	0.31	-	-	-	-	-	-	-
Bulk Products Truck Loading	4.29	2.03	0.31	-	-	-	-	-	-	-
Bulk Products Rail Unloading	4.29	2.03	0.31	-	-	-	-	-	-	-
Bulk Products Rail Loading	4.29	2.03	0.31	-	-	-	-	-	-	-
Emergency Bulk Product Storage Piles[4]										
Pile #1 Internal handling step 1	1.83	1.02	0.17	-	-	-	-	-	-	-
Pile #1 Internal handling step 2	1.83	1.02	0.17	-	-	-	-	-	-	-
Pile #1 Loadout - truck	2.58	0.87	0.15	-	-	-	-	-	-	-
Pile #2 Internal handling step 1	0.46	0.26	0.04	-	-	-	-	-	-	-
Pile #2 Internal handling step 2	0.46	0.26	0.04	-	-	-	-	-	-	-
Pile #2 Loadout - truck	0.65	0.22	0.04	-	-	-	-	-	-	-
Diesel fuel Storage, Transfer, and Dispensing	-	-	-	-	-	negl	-	negl	negl	-
Total PTE (Non-Fugitive)	**168.0**	**71.6**	**11.6**	**-**	**-**	**negl**	**-**	**negl**	**negl**	**-**

[1] The PTE is based on 10,000,000 bushels of grain per year.

[2] Pursuant to FESOP F163-30885-00035, issued on January 4, 2012, the amount of by-products (grain and soybean) received shall be less than 230,000 tons/yr.

[3] Maximum throughput of Bulk materials is 600 tons/hr.

[4] All material handled is considered grain as a worst case.

TSD Appendix A: Emission Calculations
Aggregated Process Emissions Summary

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

	Unlimited/Uncontrolled Potential to Emit (PTE) (tons/year)*									
Process Description	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Non-Fugitive Emissions										
Grain Elevator (grain receiving, handling, storage, and shipping)	61.95	24.35	4.14	-	-	-	-	-	-	-
Grain Elevator (grain by-products and soybean by-products receiving, handling, and shipping)	506.55	191.19	32.23	-	-	-	-	-	-	-
Bulk Product Handling (non-fugitive)	68.70	32.49	4.92	-	-	-	-	-	-	-
Diesel Fuel Storage, Transfer and Dispensing	-	-	-	-	-	negl	-	negl	negl	Xylenes
Emergency storage piles 1 and 2 (loading and conveying)	7.80	3.64	0.62	-	-	-	-	-	-	-
Total PTE (Non-Fugitive)**	**645.0**	**251.7**	**41.9**	**0.0**	**0.0**	**negl**	**0.0**	**negl**	**negl**	**Xylenes**
Fugitive Emissions**										
Bulk Product Handling (fugitive)	30.05	14.21	2.15	-	-	-	-	-	-	-
Open Rectangular Storage Area (receiving and shipping)	1.58	0.52	0.09	-	-	-	-	-	-	-
Storage Piles***	1.46	0.51	0.51	-	-	-	-	-	-	-
Unpaved Roads***	339.45	86.51	8.65	-	-	-	-	-	-	-
Emergency storage: pile 1 and 2 (storage pile uncovered)***	0.12	0.04	0.04	-	-	-	-	-	-	-
Total PTE (Fugitive)**	**372.7**	**101.8**	**11.4**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**-**	**-**
Total PTE (Non-Fugitive and Fugitive)**	**1017.7**	**353.5**	**53.4**	**0.0**	**0.0**	**0.00**	**0.0**	**0.00**	**negl**	**Xylenes**

	Limited/Uncontrolled Potential to Emit (PTE) (tons/year)*									
Process Description	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Non-Fugitive Emissions										
Grain Elevator (grain receiving, handling, storage, and shipping)	61.95	24.35	4.14	-	-	-	-	-	-	-
Grain Elevator (grain by-products and soybean by-products receiving, handling, and shipping)	29.56	11.16	1.88	-	-	-	-	-	-	-
Bulk Product Handling (non-fugitive)	68.70	32.49	4.92	-	-	-	-	-	-	-
Diesel Fuel Storage, Transfer, and Dispensing	-	-	-	-	-	negl	-	-	negl	Xylenes
Emergency storage pile 1 and 2 (loading and conveying)	7.80	3.64	0.62	-	-	-	-	-	-	-
Total PTE (Non-Fugitive)**	**168.0**	**71.6**	**11.6**	**-**	**-**	**-**	**-**	**-**	**negl**	**Xylenes**
Fugitive Emissions**										
Bulk Product Handling (fugitive)	30.05	14.21	2.15	-	-	-	-	-	-	-
Open Rectangular Storage Area (receiving and shipping)	1.58	0.52	0.09	-	-	-	-	-	-	-
Storage Piles***	1.46	0.51	0.51	-	-	-	-	-	-	-
Unpaved Roads***	169.72	43.26	4.33	-	-	-	-	-	-	-
Emergency storage: pile 1 and 2 (storage pile uncovered)***	0.12	0.04	0.04	-	-	-	-	-	-	-
Total PTE (Fugitive)**	**202.9**	**58.5**	**7.1**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Total PTE (Non-Fugitive and Fugitive)**	**370.9**	**130.2**	**18.7**	**-**	**-**	**-**	**-**	**-**	**negl**	**Xylenes**

	Limited/Controlled Potential to Emit (PTE) (tons/year)*									
Process Description	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Non-Fugitive Emissions										
Grain Elevator (grain receiving, handling, storage, and shipping)	13.23	5.33	0.91	-	-	-	-	-	-	-
Grain Elevator (grain by-products and soybean by-products receiving, handling, and shipping)	4.36	1.90	0.32	-	-	-	-	-	-	-
Bulk Product Handling (non-fugitive)	68.70	32.49	4.92	-	-	-	-	-	-	-
Diesel Fuel Storage, Transfer, and Dispensing	-	-	-	-	-	negl	-	-	negl	Xylenes
Emergency storage pile 1 and 2 (loading and conveying)	7.80	3.64	0.62	-	-	-	-	-	-	-
Total PTE (Non-Fugitive)**	**94.1**	**43.4**	**6.8**	**-**	**-**	**-**	**-**	**-**	**negl**	**Xylenes**
Fugitive Emissions**										
Bulk Product Handling (fugitive)	30.05	14.21	2.15	-	-	-	-	-	-	-
Open Rectangular Storage Area (receiving and shipping)	1.58	0.52	0.09	-	-	-	-	-	-	-
Storage Piles****	0.73	0.26	0.26	-	-	-	-	-	-	-
Unpaved Roads****	169.72	43.26	4.33	-	-	-	-	-	-	-
Emergency storage: pile 1 and 2 (storage pile uncovered)***	0.12	0.04	0.04	-	-	-	-	-	-	-
Total PTE (Fugitive)**	**202.2**	**58.3**	**6.9**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Total PTE (Non-Fugitive and Fugitive)**	**296.3**	**101.6**	**13.6**	**-**	**-**	**-**	**-**	**-**	**negl**	**Xylenes**

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

**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.

***Mitigated PTE (tons/yr) is taking natural mitigation due to precipitation into consideration.
****Controlled PTE (tons/yr) pursuant to control measures outlined in the Permittee's fugitive dust control plan (Attachment A).

TSD Appendix A: Emission Calculations

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

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

1. The maximum permanent grain storage capacity (grain storage capacity which is inside a building, bin, or silo and excluding emergency storage piles) of this facility is 2,489,333 bushels as summarized in the table below.

Unit ID	Maximum Grain Storage Capacity	
	tons	bushels
Tank #1	3,000	100,000
Tank #2	3,000	100,000
Tank #3	3,000	100,000
Tank #4	10,200	340,000
Tank A	600	20,000
Tank B	600	20,000
Tank #6	150	5,000
Tank #8	30,130	1,004,333
Storage Building C4	24,000	800,000
Total	**74,680**	**2,489,333**

TSD Appendix A: Emission Calculations
Emergency Bulk Material Storage Pile 2

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

Bulk Density of Grain = 60 lbs/bushel

1. Potential Grain Throughput Non-Fugitives (worst case is to consider all material as grain)

Additional Potential Grain Throughput = 500,000 (bushels/year)*
Additional Potential Grain Throughput = 15,000 (tons/year)

Total number of internal handling steps = 2
Additional Potential Internal Handling Throughput = 30,000 tons/year

Additional PTE due to emergency storage pile of 500,000 bushels

Emissions Unit Description	Potential Grain Throughput (tons/yr)	PM Emission Factor (lbs/ton)	PM_{10} Emission Factor (lbs/ton)	$PM_{2.5}$ Emission Factor (lbs/ton)	PTE of PM Before Control (tons/yr)	PTE of PM_{10} Before Control (tons/yr)	PTE of $PM_{2.5}$ Before Control (tons/yr)
Internal Handling Step 1	15,000	0.061	0.034	0.0058	0.46	0.26	0.04
Internal Handling Step 1	15,000	0.061	0.034	0.0058	0.46	0.26	0.04
Loadout - Truck **	15,000	0.086	0.029	0.0049	0.65	0.22	0.04
				Totals	**1.56**	**0.73**	**0.12**

Methodology
**Shipping by truck produces more particulate emissions than shipping by railcar or barge. To constitute a realistic maximum particulate emissions IDEM has assumed all shipping is handled by truck.
Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03)
Potential Grain Throughput (tons/year) = [Potential Grain Throughput (bushels/year)] * [60 lbs/bushel] * [ton/2000 lbs]
Potential Internal Handling Throughput (tons/year) = [Potential Grain Throughput (bushels/year)] * [Total number of internal handling steps]
PTE of PM/PM10/PM2.5 Before Control (tons/yr) = [Potential Grain Throughput (tons/yr)] * [Emission Factor (lbs/ton)] * [ton/2,000 lbs]
PTE of PM/PM10/PM2.5 After Control (tons/yr) = [PTE of PM/PM10/PM2.5 Before Control (tons/yr)] * [1 - Control Efficiency]

2. Material Storage Pile Fugitives (AP-42 Section 11.2.3)

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

Ef = 1.7*(s/1.5)*(365-p)/235*(f/15)
where Ef = emission factor (lb/acre/day)
s = silt content (wt %)
p = 125 days of rain greater than or equal to 0.01 inches
f = 15 % of wind greater than or equal to 12 mph

Storage Pile*	Materials	Worst Case Silt Content (wt %)	Emission Factor (lb/acre/day)	Maximum Anticipated Pile Size (acres)	Unlimited PTE of PM (Before Control) (tons/yr)	Unlimited PTE of $PM_{10}/PM_{2.5}$ (Before Control) (tons/yr)
Pile 2	grain, coal, and/or salt	4.6	5.32	0.13	0.121	0.043
				Total PTE =	**0.12**	**0.04**

Methodology
Maximum pile size (acres) provided by the source
***Bulk products can include grain, grain by-products, corn gluten pellets, dried distillers grain and solubles (DDGS), soybean meal, coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, dirt, iron carbide, petroleum coke, magnetite, aluminum ingots, pig iron, paper products, scrap steel, and steel coils.
Unlimited PTE of PM (tons/yr) = (Emission Factor (lb/acre/day)) * (Maximum Pile Size (acres)) * (ton/2000 lbs) * (8760 hours/yr)
Unlimited PTE of PM10 (tons/yr) = (Potential PM Emissions (tons/yr)) * 35%
*Worst case silt content values are from AP-42 Table 13.2.4-1 (dated 11/2006) as follows:
- Open Rectangular Storage Area: materials assumed equal to coal at a iron and steel production facility
- Coal Pile: coal assumed equal to coal at a iron and steel production facility
- Asphalt Pad: bulk products assumed equal to coal at a iron and steel production facility

	Uncontrolled PTE		
	PM (tons/yr)	**PM10 (tons/yr)**	**PM2.5 (tons/yr)**
Total PTE =	**1.68**	**0.77**	**0.17**

TSD Appendix A: Emission Calculations
Emergency Bulk Material Storage Pile 1

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

Bulk Density of Grain = 60 lbs/bushel

1. Potential Grain Throughput Non-Fugitives (worst case is to consider all material as grain)

Additional Potential Grain Throughput = 2,000,000 (bushels/year)*
Additional Potential Grain Throughput = 60,000 (tons/year)

Total number of internal handling steps = 2
Additional Potential Internal Handling Throughput = 120,000 tons/year

Additional PTE due to emergency storage pile of 2,000,000 bushels

Emissions Unit Description	Potential Grain Throughput (tons/yr)	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	PM2.5 Emission Factor (lbs/ton)	PTE of PM Before Control (tons/yr)	PTE of PM_{10} Before Control (tons/yr)	PTE of $PM_{2.5}$ Before Control (tons/yr)
Internal Handling Step 1	60,000	0.061	0.034	0.0058	1.83	1.02	0.17
Internal Handling Step 2	60,000	0.061	0.034	0.0058	1.83	1.02	0.17
Loadout - Truck **	60,000	0.086	0.029	0.0049	2.58	0.87	0.15
				PTE Total =	**6.24**	**2.91**	**0.50**

Methodology
**Shipping by truck produces more particulate emissions than shipping by railcar or barge. To constitute a realistic maximum particulate emissions IDEM has assumed all shipping is handled by truck.
Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03)
Potential Grain Throughput (tons/year) = [Potential Grain Throughput (bushels/year)] * [60 lbs/bushel] * [ton/2000 lbs]
Potential Internal Handling Throughput (tons/year) = [Potential Grain Throughput (bushels/year)] * [Total number of internal handling steps]
PTE of PM/PM10/PM2.5 Before Control (tons/yr) = [Potential Grain Throughput (tons/yr)] * [Emission Factor (lbs/ton)] * [ton/2,000 lbs]
PTE of PM/PM10/PM2.5 After Control (tons/yr) = [PTE of PM/PM10/PM2.5 Before Control (tons/yr)] * [1 - Control Efficiency]

2. Material Storage Pile Fugitives (AP-42 Section 11.2.3)

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

Ef = 1.7*(s/1.5)*(365-p)/235*(f/15)
where Ef = emission factor (lb/acre/day)
s = silt content (wt %)
p = 125 days of rain greater than or equal to 0.01 inches
f = 15 % of wind greater than or equal to 12 mph

Storage Pile*	Materials	Worst Case Silt Content (wt %)	Emission Factor (lb/acre/day)	Maximum Anticipated Pile Size (acres)	Unlimited PTE of PM (Before Control) (tons/yr)	Unlimited PTE of $PM_{10}/PM_{2.5}$ (Before Control) (tons/yr)
Pile 1	grain, coal, and/or salt	4.6	5.32	0.25	0.243	0.085
				Total PTE =	**0.24**	**0.09**

Methodology
Maximum pile size (acres) provided by the source
***Bulk products can include grain, grain by-products, corn gluten pellets, dried distillers grain and solubles (DDGS), soybean meal, coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, dirt, iron carbide, petroleum coke, magnetite, aluminum ingots, pig iron, paper products, scrap steel, and steel coils.
Unlimited PTE of PM (tons/yr) = (Emission Factor (lb/acre/day)) * (Maximum Pile Size (acres)) * (ton/2000 lbs) * (8760 hours/yr)
Unlimited PTE of PM10 (tons/yr) = (Potential PM Emissions (tons/yr)) * 35%
*Worst case silt content values are from AP-42 Table 13.2.4-1 (dated 11/2006) as follows:
- Open Rectangular Storage Area: materials assumed equal to coal at a iron and steel production facility
- Coal Pile: coal assumed equal to coal at a iron and steel production facility
- Asphalt Pad: bulk products assumed equal to coal at a iron and steel production facility

	Uncontrolled PTE		
	PM (tons/yr)	**PM10 (tons/yr)**	**PM2.5 (tons/yr)**
Total PTE =	**6.48**	**3.00**	**0.58**

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

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

Bulk Density of Grain = 60 lbs/bushel

1. Potential Grain Throughput Calculations

The source has requested that the potential grain throughput be assumed to be 10,000,000 bushels/year (300,000 tons/year), which is greater than 1.2 times the maximum annual grain received during the last 5 years.

Potential Grain Throughput = 10,000,000 (bushels/year)*
Potential Grain Throughput = 300,000 (tons/year)

Total number of internal handling steps = 2
Potential Internal Handling Throughput = 600,000 tons/year

2. PTE Calculations

Emissions Unit Description	Potential Grain Throughput (tons/yr)	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	PM2.5 Emission Factor (lbs/ton)	Control Device(s)	Collection and Control Efficiency (%)	PTE of PM Before Control (tons/yr)	PTE of PM10 Before Control (tons/yr)	PTE of PM2.5 Before Control (tons/yr)	PTE of PM After Control (tons/yr)	PTE of PM10 After Control (tons/yr)	PTE of PM2.5 After Control (tons/yr)
Receiving - Straight Truck	300,000	0.18	0.059	0.010	Baghouse #1	90%	27.00	8.85	1.50	2.70	0.89	0.15
Internal Handling	600,000	0.061	0.034	0.0058	Enclosed***	70%	18.30	10.20	1.74	5.49	3.06	0.52
Loadout - Truck **	300,000	0.086	0.029	0.0049	Baghouse #2	90%	12.90	4.35	0.74	1.29	0.44	0.07
Storage - Silos and Bins	300,000	0.025	0.0063	0.0011	None	0%	3.75	0.95	0.17	3.75	0.95	0.17
						Totals	**61.95**	**24.35**	**4.14**	**13.2**	**5.33**	**0.91**

Methodology

*The source has requested that the potential grain throughput be assumed to be 10,000,000 bushels/year (300,000 tons/year)
**Shipping by truck produces more particulate emissions than shipping by railcar or barge. To constitute a realistic maximum particulate emissions IDEM has assumed all shipping is handled by truck.
Truck (or rail) loadout and barge loadout are controlled by baghouse #2.
*** According to the Air Pollution Engineering Manual (Buonicore and Davis, 1992), enclosure of material transfer points and storage piles can result in particulate emission reductions of 70% as a conservative estimate.

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03)
Potential Grain Throughput (tons/year) = [Potential Grain Throughput (bushels/year)] * [60 lbs/bushel] * [ton/2000 lbs]
Potential Internal Handling Throughput (tons/year) = [Potential Grain Throughput (bushels/year)] * [Total number of internal handling steps]
PTE of PM/PM10/PM2.5 Before Control (tons/yr) = [Potential Grain Throughput (tons/yr)] * [Emission Factor (lbs/ton)] * [ton/2,000 lbs]
PTE of PM/PM10/PM2.5 After Control (tons/yr) = [PTE of PM/PM10/PM2.5 Before Control (tons/yr)] * [1 - Control Efficiency]

TSD Appendix A: Emission Calculations
Grain Elevator: Grain By-Products and Soybean By-Products Receiving, Handling, and Shipping

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

1. Unlimited PTE Calculations for Grain By-Product and Soybean By-Product

	Maximum By-Product Throughput (tons/hr)	Maximum Annual Operating Hours (hours/yr)	Potential By-Product Throughput (tons/yr)
Total	450	8,760	3,942,000

Emissions Unit Description	Maximum By-Product Throughput (tons/yr)	PM Emission Factor (lbs/ton)***	PM10 Emission Factor (lbs/ton)***	PM2.5 Emission Factor (lbs/ton)***	Control Device(s)	Collection and Control Efficiency (%)	Unlimited PTE of PM Before Control (tons/yr)	Unlimited PTE of PM10 Before Control (tons/yr)	Unlimited PTE of PM2.5 Before Control (tons/yr)	Unlimited PTE of PM After Control (tons/yr)	Unlimited PTE of PM10 After Control (tons/yr)	Unlimited PTE of PM2.5 After Control (tons/yr)
Receiving - Straight Truck	3,942,000	0.18	0.059	0.010	Baghouse #1	90%	354.78	116.29	19.71	35.48	11.63	1.97
Internal Handling	3,942,000	0.061	0.034	0.0058	Enclosed*****	70%	120.23	67.01	11.43	36.07	20.10	3.43
Loadout - Barge *	3,942,000	0.016	0.004	0.00055	Baghouse #2	90%	31.54	7.88	1.08	3.15	0.79	0.11
Storage - Silos and Bins **	0	0.025	0.0063	0.0011	None	0%	0.00	0.00	0.00	0.00	0.00	0.00
						Totals	**506.55**	**191.19**	**32.23**	**74.70**	**32.52**	**5.51**

2. Limited PTE Calculations for Grain By-Product and Soybean By-Product

	Limited By-Product Throughput (tons/yr)****
Total	230,000

Emissions Unit Description	Limited By-Product Throughput (tons/yr)	PM Emission Factor (lbs/ton)***	PM10 Emission Factor (lbs/ton)***	PM2.5 Emission Factor (lbs/ton)***	Control Device(s)	Collection and Control Efficiency (%)	Limited PTE of PM Before Control (tons/yr)	Limited PTE of PM10 Before Control (tons/yr)	Limited PTE of PM2.5 Before Control (tons/yr)	Limited PTE of PM After Control (tons/yr)	Limited PTE of PM10 After Control (tons/yr)	Limited PTE of PM2.5 After Control (tons/yr)
Receiving - Straight Truck	230,000	0.18	0.059	0.010	Baghouse #1	90%	20.70	6.79	1.15	2.07	0.68	0.12
Internal Handling	230,000	0.061	0.034	0.0058	Enclosed*****	70%	7.02	3.91	0.67	2.10	1.17	0.20
Loadout - Barge *	230,000	0.016	0.004	0.00055	Baghouse #2	90%	1.84	0.46	0.06	0.18	0.05	0.01
Storage - Silos and Bins **	0	0.025	0.0063	0.0011	None	0%	0.00	0.00	0.00	0.00	0.00	0.00
						Totals	**29.56**	**11.16**	**1.88**	**4.36**	**1.90**	**0.32**

Methodology
* Shipping of grain by-products and soybean by-products is only by barge.
**The source will not be storing grain by-products and soybean by-products.
***Since there are no AP-42 emissions factors for grain by-products and soybean by-products, the emission factors used as alternative emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03).
****The above throughput and PM/PM10/PM2.5 limitations are intended to limit the PM/PM10/PM2.5 emissions before control and do not take into account PM/PM10/PM2.5 control provided by the Baghouse #1, Baghouse #2, or the enclosures on the internal handling equipment.
***** According to the Air Pollution Engineering Manual (Buonicore and Davis, 1992), enclosure of material transfer points and storage piles can result in particulate emission reductions of 70% as a conservative estimate.

Maximum Throughput (tons/yr) = Maximum grain byproducts and soybean byproducts available from supplier.
Unlimited PTE of PM/PM10/PM2.5 Before Control (tons/yr) = [Maximum Throughput (tons/yr)] * [Emission Factor (lbs/ton)] * [ton/2,000 lbs]
Unlimited PTE of PM/PM10/PM2.5 After Control (tons/yr) = [Unlimited PTE of PM/PM10/PM2.5 Before Control (tons/yr)] * [1 - Control Efficiency]

Limited PTE of PM/PM10/PM2.5 Before Control (tons/yr) = [Limited Throughput (tons/yr)] * [Emission Factor (lbs/ton)] * [ton/2,000 lbs]
Limited PTE of PM/PM10/PM2.5 After Control (tons/yr) = [Limited PTE of PM/PM10/PM2.5 Before Control (tons/yr)] * [1 - Control Efficiency]

TSD Appendix A: Emission Calculations
Open rectangular storage area equipped with concrete walls
for storage of grain, coal, and/or salt

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

Receiving and Shipping of Bulk Products Fugitives (Grain, Coal, and/or Salt)
To estimate potential fugitive dust emissions from receiving and shipping of grain, coal, and/or salt, emission factors from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03) are utilized.

Emissions Unit Description	Potential Grain Throughput (tons/yr)	PM Emission Factor*** (lbs/ton)	PM10 Emission Factor*** (lbs/ton)	PM2.5 Emission Factor*** (lbs/ton)	PTE of PM Before Control (tons/yr)	PTE of PM10 Before Control (tons/yr)	PTE of PM2.5 Before Control (tons/yr)
Receiving - Straight Truck*	11,900	0.18	0.059	0.010	1.07	0.35	0.06
Shipping - Truck**	11,900	0.086	0.029	0.0049	0.51	0.17	0.03
				Totals	**1.58**	**0.52**	**0.09**

Methodology
*Worst case truck receiving/unloading into the grain storage pile based on straight truck.
**Shipping by truck produces more particulate emissions than shipping by railcar or barge. To constitute a realistic maximum particulate emissions IDEM has assumed all shipping is handled by truck.
***Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03)
Note: The emission factors for receiving and shipping of grain by truck from AP42 Table 9.9.1-1 (Particulate Emission Factors for Grain Elevators (3/03)) are greater than the emission factors for dropping of coal or salt onto piles from AP42 Section 13.2.4 (Aggregate Handling, fifth edition, 11/2006) at the anticipated moisture content and wind speed. Therefore emission factors for receiving and shipping of grain by truck (AP42 Table 9.9.1-1) are utilized.
PTE of PM/PM10/PM2.5 Before Control (tons/yr) = [Potential Grain Throughput (tons/yr)] * [Emission Factor (lbs/ton)] * [ton/2,000 lbs]
PTE of PM/PM10/PM2.5 After Control (tons/yr) = [PTE of PM/PM10/PM2.5 Before Control (tons/yr)] * [1 - Control Efficiency]

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PTE = Potential to Emit

TSD Appendix A: Emission Calculations
Barge A Receiving (Incoming) of Bulk Products
Particulate Emissions

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from unloading of bulk products from barges (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 11/2006) are utilized.

Note: Bulk products can include grain, grain byproducts, corn gluten pellets, dried distillers grain and solubles (DDGS), soybean meal, coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, dirt, iron carbide, petroleum coke, magnetite, aluminum ingots, pig iron, paper products, scrap steel, and steel coils.

$Ef = k*(0.0032)*[(U/5)^{1.3} / (M/2)^{1.4}]$

where:

Ef =	Emission factor (lb/ton)	
k (PM) =	0.74	= particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
k (PM10) =	0.35	= particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
k(PM2.5) =	0.053	= particle size multiplier (0.35 assumed for aerodynamic diameter <=2.5 um)
U =	9.0	= worst case annual mean wind speed (Source: NOAA, 2008*)
M =	4.5	= material % moisture content of materials (assuming products are similar to coal)**

Emission factor (Ef) (lb/ton)		
PM	PM10	PM2.5
1.63E-03	7.73E-04	1.17E-04

Barge A Unloading/Receiving (Incoming)

Type of Activity	Type of Emissions	Maximum Material Handling Throughput (tons/hour)	Number of Drop Points	Uncontrolled PTE of PM (tons/yr)	Uncontrolled PTE of PM10 (tons/yr)	Uncontrolled PTE of PM2.5 (tons/yr)
Unloading bulk products from barge to receiving hopper A2 using clamshell A1	Non-Fugitive	600	1	4.29	2.03	0.31
Conveyor Transfer Points (A3, C5-1, C5-2, and C5-3)	Non-Fugitive	600	4	17.17	8.12	1.23
Unloading bulk products from conveyor to storage pile	Fugitive	600	1	4.29	2.03	0.31
Total Non-Fugitive Emissions (tons/yr)				21.47	10.15	1.54
Total Fugitive Emissions (tons/yr)				4.29	2.03	0.31

Methodology

Uncontrolled Potential to Emit (tons/yr) = [Maximum Material Handling Throughput (tons/hour)] * [Emission Factor (lb/ton)] * [Number of Drop Points] * [8760 hours/year] * [ton/2000 lbs]
*Worst case annual mean wind speed (Greater Cincinnati Airport) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2008
**Worst case moisture content of bulk products assumed equal to coal

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PTE = Potential to Emit

TSD Appendix A: Emission Calculations
Barge B Loading/Shipping (Outgoing) of Bulk Products
Particulate Emissions

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from loading of bulk products onto barges for offsite shipment (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 11/2006) are utilized.

Note: Bulk products can include grain, grain bi-products, corn gluten pellets, dried distillers grain and solubles (DDGS), soybean meal, coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, dirt, iron carbide, petroleum coke, magnetite, aluminum ingots, pig iron, paper products, scrap steel, and steel coils.

$Ef = k*(0.0032)*[(U/5)^{1.3} / (M/2)^{1.4}]$

where:

Ef =	Emission factor (lb/ton)	
k (PM) =	0.74	= particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
k (PM10) =	0.35	= particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
k(PM2.5) =	0.053	= particle size multiplier (0.35 assumed for aerodynamic diameter <=2.5 um)
U =	9.0	= worst case annual mean wind speed (Source: NOAA, 2008*)
M =	4.5	= material % moisture content of materials (assuming products are similar to coal)**

Emission factor (Ef) (lb/ton)		
PM	PM10	PM2.5
1.63E-03	7.73E-04	1.17E-04

Barge B Loading/Shipping (Outgoing)

Type of Activity	Type of Emissions	Maximum Material Handling Throughput (tons/hour)	Number of Drop Points	Uncontrolled PTE of PM (tons/yr)	Uncontrolled PTE of PM_{10} (tons/yr)	Uncontrolled PTE of $PM_{2.5}$ (tons/yr)
Loading bulk products into barge shipping hopper B1 (with conveyor B2) using front end loader	Non-Fugitive	600	1	4.29	2.03	0.31
Unloading bulk products from shipping conveyor B2 to barge	Fugitive	600	1	4.29	2.03	0.31
Total Non-Fugitive Emissions (tons/yr)				4.29	2.03	0.31
Total Fugitive Emissions (tons/yr)				4.29	2.03	0.31

Methodology

Uncontrolled Potential to Emit (tons/yr) = [Maximum Material Handling Throughput (tons/hour)] * [Emission Factor (lb/ton)] * [Number of Drop Points] * [8760 hours/year] * [ton/2000 lbs]
*Worst case annual mean wind speed (Greater Cincinnati Airport) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2008
**Worst case moisture content of bulk products assumed equal to coal

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PTE = Potential to Emit

TSD Appendix A: Emission Calculations
Barge D Receiving (Incoming) of Bulk Products
Particulate Emissions

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from unloading of bulk products from barges (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 11/2006) are utilized.

Note: Bulk products can include grain, grain bi-products, corn gluten pellets, dried distillers grain and solubles (DDGS), soybean meal, coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, dirt, iron carbide, petroleum coke, magnetite, aluminum ingots, pig iron, paper products, scrap steel, and steel coils.

$Ef = k*(0.0032)*[(U/5)^{1.3} / (M/2)^{1.4}]$

where:

Ef =	Emission factor (lb/ton)	
k (PM) =	0.74	= particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
k (PM10) =	0.35	= particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
k(PM2.5) =	0.053	= particle size multiplier (0.35 assumed for aerodynamic diameter <=2.5 um)
U =	9.0	= worst case annual mean wind speed (Source: NOAA, 2008*)
M =	4.5	= material % moisture content of materials (assuming products are similar to coal)**

Emission factor (Ef) (lb/ton)		
PM	PM_{10}	$PM_{2.5}$
1.63E-03	7.73E-04	1.17E-04

Barge D Unloading/Receiving (Incoming)

Type of Activity	Type of Emissions	Maximum Material Handling Throughput (tons/hour)	Number of Drop Points	Uncontrolled PTE of PM (tons/yr)	Uncontrolled PTE of PM_{10} (tons/yr)	Uncontrolled PTE of $PM_{2.5}$ (tons/yr)
Unloading bulk products from barge to receiving hopper D2 using clamshell D1	Non-Fugitive	600	1	4.29	2.03	0.31
Conveyor Transfer Points (D3-1 through D3-5)	Non-Fugitive	600	5	21.47	10.15	1.54
Unloading bulk products from conveyor to storage pile	Fugitive	600	1	4.29	2.03	0.31
Total Non-Fugitive Emissions (tons/yr)				25.76	12.18	1.85
Total Fugitive Emissions (tons/yr)				4.29	2.03	0.31

Methodology

Uncontrolled Potential to Emit (tons/yr) = [Maximum Material Handling Throughput (tons/hour)] * [Emission Factor (lb/ton)] * [Number of Drop Points] * [8760 hours/year] * [ton/2000 lbs]
*Worst case annual mean wind speed (Greater Cincinnati Airport) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2008
**Worst case moisture content of bulk products assumed equal to coal

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PTE = Potential to Emit

TSD Appendix A: Emission Calculations
Receiving and Shipping of Bulk Products by Truck
Particulate Emissions

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

Drop Operations (AP-42 Section 13.2.4)
To estimate potential fugitive dust emissions from truck unloading/loading of bulk products (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 11/2006) are utilized.

Note: Bulk products can include grain, grain by-products, corn gluten pellets, dried distillers grain and solubles (DDGS), soybean meal, coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, dirt, iron carbide, petroleum coke, magnetite, aluminum ingots, pig iron, paper products, scrap steel, and steel coils.

Ef = k*(0.0032)*[(U/5)^1.3 / (M/2)^1.4]

where:

Ef =	Emission factor (lb/ton)	
k (PM) =	0.74	= particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
k (PM10) =	0.35	= particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
k(PM2.5) =	0.053	= particle size multiplier (0.35 assumed for aerodynamic diameter <=2.5 um)
U =	9.0	= worst case annual mean wind speed (Source: NOAA, 2008*)
M =	4.5	= material % moisture content of materials (assuming products are similar to coal)**

Emission factor (Ef) (lb/ton)		
PM	PM_{10}	$PM_{2.5}$
1.63E-03	7.73E-04	1.17E-04

Offsite Truck Unloading/Receiving (Incoming)

Type of Activity	Type of Emissions	Maximum Material Handling Throughput (tons/hour)	Number of Drop Points	Uncontrolled PTE of PM (tons/yr)	Uncontrolled PTE of PM_{10} (tons/yr)	Uncontrolled PTE of $PM_{2.5}$ (tons/yr)
Unloading bulk products from truck to storage pile conveyor	Non-Fugitive	600	1	4.29	2.03	0.31
Unloading bulk products from storage pile conveyor to storage pile	Fugitive	600	1	4.29	2.03	0.31

Offsite Truck Loading/Shipping (Outgoing)

Type of Activity	Type of Emissions	Maximum Material Handling Throughput (tons/hour)	Number of Drop Points	Uncontrolled PTE of PM (tons/yr)	Uncontrolled PTE of PM_{10} (tons/yr)	Uncontrolled PTE of $PM_{2.5}$ (tons/yr)
Loading bulk products from storage pile into truck shipping hopper/conveyor using front end loader	Non-Fugitive	600	1	4.29	2.03	0.31
Unloading bulk products from truck shipping conveyor to trucks for offsite shipment	Fugitive	600	1	4.29	2.03	0.31

Total Potential to Emit
The total potential to emit is calculated assuming that the terminal can simulataneously unload and load trucks simulaneously using different equipment.

	PM	PM10	PM2.5
Total Non-Fugitive Emissions (tons/yr)	**8.59**	**4.06**	**0.62**
Total Fugitive Emissions (tons/yr)	**8.59**	**4.06**	**0.62**

Methodology
Uncontrolled Potential to Emit (tons/yr) = [Maximum Material Handling Throughput (tons/hour)] * [Emission Factor (lb/ton)] * [Number of Drop Points] * [8760 hours/year] * [ton/2000 lbs]
*Worst case annual mean wind speed (Greater Cincinnati Airport) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2008
**Worst case moisture content of bulk products assumed equal to coal

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PTE = Potential to Emit

TSD Appendix A: Emission Calculations
Receiving and Shipping of Bulk Products by Railcar
Particulate Emissions

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

Drop Operations (AP-42 Section 13.2.4)
To estimate potential fugitive dust emissions from railcar unloading/loading of bulk products (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 11/2006) are utilized.

Note: Bulk products can include grain, grain by-products, corn gluten pellets, dried distillers grain and solubles (DDGS), soybean meal, coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, dirt, iron carbide, petroleum coke, magnetite, aluminum ingots, pig iron, paper products, scrap steel, and steel coils.

Ef = k*(0.0032)*[(U/5)^1.3 / (M/2)^1.4]

where:

Ef =	Emission factor (lb/ton)	
k (PM) =	0.74	= particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
k (PM10) =	0.35	= particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
k(PM2.5) =	0.053	= particle size multiplier (0.35 assumed for aerodynamic diameter <=2.5 um)
U =	9.0	= worst case annual mean wind speed (Source: NOAA, 2008*)
M =	4.5	= material % moisture content of materials (assuming products are similar to coal)**

Emission factor (Ef) (lb/ton)		
PM	PM_{10}	$PM_{2.5}$
1.63E-03	7.73E-04	1.17E-04

Offsite Railcar Unloading/Receiving (Incoming)

Type of Activity	Type of Emissions	Maximum Material Handling Throughput (tons/hour)	Number of Drop Points	Uncontrolled PTE of PM (tons/yr)	Uncontrolled PTE of PM_{10} (tons/yr)	Uncontrolled PTE of $PM_{2.5}$ (tons/yr)
Unloading bulk products from railcar to storage pile conveyor	Non-Fugitive	600	1	4.29	2.03	0.31
Unloading bulk products from storage pile conveyor to storage pile	Fugitive	600	1	4.29	2.03	0.31

Offsite Railcar Loading/Shipping (Outgoing)

Type of Activity	Type of Emissions	Maximum Material Handling Throughput (tons/hour)	Number of Drop Points	Uncontrolled PTE of PM (tons/yr)	Uncontrolled PTE of PM10 (tons/yr)	Uncontrolled PTE of PM2.5 (tons/yr)
Loading bulk products from storage pile into railcar shipping hopper/conveyor using front end loader	Non-Fugitive	600	1	4.29	2.03	0.31
Unloading bulk products from railcar shipping conveyor to railcars for offsite shipment	Fugitive	600	1	4.29	2.03	0.31

Total Potential to Emit
The total potential to emit is calculated assuming that the terminal can simulataneously unload and load railcar simulaneously using different equipment.

	PM	PM10	PM2.5
Total Non-Fugitive Emissions (tons/yr)	**8.59**	**4.06**	**0.62**
Total Fugitive Emissions (tons/yr)	**8.59**	**4.06**	**0.62**

Methodology
Uncontrolled Potential to Emit (tons/yr) = [Maximum Material Handling Throughput (tons/hour)] * [Emission Factor (lb/ton)] * [Number of Drop Points] * [8760 hours/year] * [ton/2000 lbs]
*Worst case annual mean wind speed (Greater Cincinnati Airport) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2008
**Worst case moisture content of bulk products assumed equal to coal

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PTE = Potential to Emit

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

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

Material Storage Piles (AP-42 Section 11.2.3)

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

Ef = 1.7*(s/1.5)*(365-p)/235*(f/15)
where Ef = emission factor (lb/acre/day)
s = silt content (wt %)
p = 125 days of rain greater than or equal to 0.01 inches
f = 15 % of wind greater than or equal to 12 mph

Storage Pile*	Materials	Worst Case Silt Content (wt %)*	Emission Factor (lb/acre/day)	Maximum Anticipated Pile Size (acres)**	Unlimited PTE of PM (Before Control) (tons/yr)	Unlimited PTE of PM10/PM2.5 (Before Control) (tons/yr)
Open Rectangular Storage Area	grain, coal, and/or salt	4.6	5.32	0.70	0.680	0.238
Coal Storage Pile	coal	4.6	5.32	0.25	0.243	0.085
Asphalt Pad Storage Area	bulk products***	4.6	5.32	0.55	0.535	0.187
				Totals PTE (Before Control) =	**1.46**	**0.51**
				Dust Control Efficiency =	50.0%	50.0%
				Totals PTE (After Control) =	**0.73**	**0.26**

Methodology

*The bulk product storage building has no fugitive dust emissions from wind erosion, since it is an enclosed building.
**Maximum pile size (acres) provided by the source
***Bulk products can include grain, grain bi-products, corn gluten pellets, dried distillers grain and solubles (DDGS), soybean meal, coal, fertilizer, salt, direct-reduced iron (DRI), aggregate, sand, gravel, stone, gypsum rock, dirt, iron carbide, petroleum coke, magnetite, aluminum ingots, pig iron, paper products, scrap steel, and steel coils.
Unlimited PTE of PM (tons/yr) = (Emission Factor (lb/acre/day)) * (Maximum Pile Size (acres)) * (ton/2000 lbs) * (8760 hours/yr)
Unlimited PTE of PM10/PM2.5 (tons/yr) = (Potential PM Emissions (tons/yr)) * 35%
*Worst case silt content values are from AP-42 Table 13.2.4-1 (dated 11/2006) as follows:
- Open Rectangular Storage Area: materials assumed equal to coal at a iron and steel production facility
- Coal Pile: coal assumed equal to coal at a iron and steel production facility
- Asphalt Pad: bulk products assumed equal to coal at a iron and steel production facility

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

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-36835-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

Potential Grain Throughput = 300,000 tons/year

Potential Byproduct Throughput = 3,942,000 tons/year

339.45

Potential Open Rectangular Storage Area Throughput = 11,900 tons/year

Maximum Offsite Bulk Product Receiving by Truck Hourly Throughput = 600 tons/hour
Maximum Offsite Bulk Product Receiving by Truck Annual Throughput = 5,256,000 tons/year

Maximum Onsite Bulk Product Transfer by Truck Hourly Throughput = 600 tons/hour
Maximum Onsite Bulk Product Transfer by Truck Annual Throughput = 5,256,000 tons/year

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).

Process	Vehicle Type	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)*	Maximum one-way distance (miles/trip)	Maximum one-way miles (miles/yr)
Grain truck entering site full	Grain Tanker (5 axle bulk dry tanker)	19.0	26.0	45.0	1.2E+04	5.2E+05	600	0.11	1311.2
Grain truck leaving site empty	Grain Tanker (5 axle bulk dry tanker)	19.0	0.0	19.0	1.2E+04	2.2E+05	600	0.11	1311.2
Byproduct truck entering site full	Grain Tanker (5 axle bulk dry tanker)	19.0	26.0	45.0	1.5E+05	6.8E+06	600	0.11	17229.0
Byproduct truck leaving site empty	Grain Tanker (5 axle bulk dry tanker)	19.0	0.0	19.0	1.5E+05	2.9E+06	600	0.11	17229.0
Open Rectangular Storage Area truck entering site full	Grain Tanker (5 axle bulk dry tanker)	19.0	26.0	45.0	4.6E+02	2.1E+04	600	0.11	52.0
Open Rectangular Storage Area truck leaving site empty	Grain Tanker (5 axle bulk dry tanker)	19.0	0.0	19.0	4.6E+02	8.7E+03	600	0.11	52.0
Worst case offsite bulk product truck traveling to storage areas full	Dump truck (16 CY)	16.0	23.0	39.0	2.3E+05	8.9E+06	500	0.09	21640.3
Worst case offsite bulk product truck leaving storage areas empty	Dump truck (16 CY)	16.0	0.0	16.0	2.3E+05	3.7E+06	500	0.09	21640.3
Onsite utility/maintenance pickup truck (10 one-way trips per day)	Pickup Truck	2.5	0.7	3.2	3.7E+03	1.2E+04	500	0.09	345.6
Worst case offsite bulk product truck traveling to storage areas empty*	Dump truck (16 CY)	16.0	0.0	16.0	2.3E+05	3.7E+06	500	0.09	21640.3
Worst case offsite bulk product truck leaving storage areas full	Dump truck (16 CY)	16.0	23.0	39.0	2.3E+05	8.9E+06	500	0.09	21640.3
Worst case onsite bulk product transfer truck transporting material from barge receiving to storage area full	Dump truck (16 CY)	16.0	23.0	39.0	2.3E+05	8.9E+06	250	0.05	10820.2
Worst case onsite bulk product transfer truck traveling from storage area to barge receiving hopper empty	Dump truck (16 CY)	16.0	0.0	16.0	2.3E+05	3.7E+06	250	0.05	10820.2
	Total				**1,702,004**	**48,188,905**			**145,732**

Average Vehicle Weight Per Trip = 28.3 tons/trip
Average Miles Per Trip = 0.09 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	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	28.3	28.3	28.3	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365] (Equation 2 from AP-42 13.2.2)
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	7.08	1.81	0.18	lb/mile
Mitigated Emission Factor, Eext =	4.66	1.19	0.12	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in the Permittee's fugitive dust control plan)

Process	Vehicle Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Grain truck entering site full	Grain Tanker (5 axle bulk dry tanker)	4.64	1.18	0.12	3.05	0.78	0.08	1.53	0.39	0.04
Grain truck leaving site empty	Grain Tanker (5 axle bulk dry tanker)	4.64	1.18	0.12	3.05	0.78	0.08	1.53	0.39	0.04
Byproduct truck entering site full	Grain Tanker (5 axle bulk dry tanker)	61.03	15.55	1.56	40.13	10.23	1.02	20.07	5.11	0.51
Byproduct truck leaving site empty	Grain Tanker (5 axle bulk dry tanker)	61.03	15.55	1.56	40.13	10.23	1.02	20.07	5.11	0.51
Open Rectangular Storage Area truck entering site full	Grain Tanker (5 axle bulk dry tanker)	0.18	0.05	0.00	0.12	0.03	0.00	0.06	0.02	0.00
Open Rectangular Storage Area truck leaving site empty	Grain Tanker (5 axle bulk dry tanker)	0.18	0.05	0.00	0.12	0.03	0.00	0.06	0.02	0.00
Worst case offsite bulk product truck traveling to storage areas full	Dump truck (16 CY)	76.66	19.54	1.95	50.41	12.85	1.28	25.20	6.42	0.64
Worst case offsite bulk product truck leaving storage areas empty	Dump truck (16 CY)	76.66	19.54	1.95	50.41	12.85	1.28	25.20	6.42	0.64
Onsite utility/maintenance pickup truck (10 one-way trips per day)	Pickup Truck	1.22	0.31	0.03	0.81	0.21	0.02	0.40	0.10	0.01
Worst case offsite bulk product truck traveling to storage areas empty*	Dump truck (16 CY)	76.66	19.54	1.95	50.41	12.85	1.28	25.20	6.42	0.64
Worst case offsite bulk product truck leaving storage areas full	Dump truck (16 CY)	76.66	19.54	1.95	50.41	12.85	1.28	25.20	6.42	0.64
Worst case onsite bulk product transfer truck transporting material from barge receiving to storage area full	Dump truck (16 CY)	38.33	9.77	0.98	25.20	6.42	0.64	12.60	3.21	0.32
Worst case onsite bulk product transfer truck traveling from storage area to barge receiving hopper empty	Dump truck (16 CY)	38.33	9.77	0.98	25.20	6.42	0.64	12.60	3.21	0.32
		516.24	**131.57**	**13.16**	**339.45**	**86.51**	**8.65**	**169.72**	**43.26**	**4.33**

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

TSD Appendix A: Emission Calculations
Diesel Fuel Storage Tanks, Fuel Transfer, and Dispensing
Volatile Organic Compound (VOC)

Company Name: ADM Grain Company
Source Address: 2730 Dixie Flyer Road, Evansville, IN 47712
FESOP Renewal No.: F163-30885-00035
Reviewer: Donald McQuigg
Date: 2/12/2016

Volatile Organic Compound (VOC) Emissions From Storage Tanks (Working and Breathing Losses) Using US EPA TANKS Version 4.09 program

VOC emissions from storage tanks were determined by using US EPA TANKS Version 4.09 program.

Product Stored	Maximum Liquid Volume (gallons)	Turnovers per year	Product Throughput (gallons/yr)*	VOC Working Losses (lbs/yr)	VOC Breathing Losses (lbs/yr)	Total VOC Losses (lbs/yr)	VOC Working Losses (tons/yr)	VOC Breathing Losses (tons/yr)	Total VOC Losses (tons/yr)
Diesel	5,000	52.0	260,000	4.60	2.30	6.9	2.3E-03	1.2E-03	3.5E-03
					Totals	**6.9**			**0.003**

Methodology
*As a worst case assumption, each tank is assumed to have 1 turnover per week (52 turnovers per year).
Product Throughput (gallons/yr) = [Maximum Liquid Volume (gallons)] * [Turnovers per year]

Hazardous Air Pollutant (HAP) Emissions

Product Stored	Total PTE of VOC (tons/yr)	PTE of Total HAPs (tons/yr)	PTE of Worst Single HAP (tons/yr)	Worst Single HAP
Diesel	3.5E-03	4.5E-05	1.7E-05	Xylenes
	Totals	**4.45E-05**	**1.73E-05**	**Xylenes**

Hazardous Air Pollutant (HAP) Content (% by weight) For Various Petroleum Mixtures*

Volatile Organic HAP	CAS#	HAP Content (% by weight)* Gasoline	Diesel (#2) Fuel Oil
1,3-Butadiene	106-99-0	3.70E-5%	
2,2,4-Trimethylpentane	540-84-1	2.40%	
Acenaphthene	83-32-9		
Acenaphthylene	208-96-8		
Anthracene	120-12-7		5.80E-5%
Benzene	71-43-2	1.90%	2.90E-4%
Benzo(a)anthracene	56-55-3		9.60E-7%
Benzo(a)pyrene	50-32-8		2.20E-6%
Benzo(g,h,i)perylene	191-24-2		1.20E-7%
Biphenyl	92-52-4		6.30E-4%
Chrysene	218-01-9		4.50E-7%
Ethylbenzene	100-41-4	1.70%	0.07%
Fluoranthene	206-44-0		5.90E-5%
Fluorene	86-73-7		8.60E-4%
Indeno(1,2,3-cd)pyrene	193-39-5		1.60E-7%
Methyl-tert-butylether	1634-04-4	0.33%	
Naphthalene	91-20-3	0.25%	0.26%
n-Hexane	110-54-3	2.40%	
Phenanthrene	85-01-8		8.80E-4%
Pyrene	129-00-0		4.60E-5%
Toluene	108-88-3	8.10%	0.18%
Total Xylenes	1330-20-7	9.00%	0.50%
Total Organic HAPs		**26.08%**	**1.29%**
Worst Single HAP		**9.00% Xylenes**	**0.50% Xylenes**

Methodology
*Source: Petroleum Liquids. Potter, T.L. and K.E. Simmons. 1998. Total Petroleum Hydrocarbon Criteria Working Group Series, Volume 2. Composition of Petroleum Mixtures. The Association for Environmental Health and Science. Available on the Internet at: http://www.aehsfoundation.org/Publications.aspx
PTE of Total HAPs (tons/yr) = [Total HAP Content (% by weight)] * [PTE of VOC (tons/yr)]
PTE of Worst Single HAP (tons/yr) = [Worst Single HAP Content (% by weight)] * [PTE of VOC (tons/yr)]

Abbreviations
VOC = Volatile Organic Compounds
PTE = Potential to Emit
HAP = Hazardous Air Pollutant

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 1, 2016

Ms. Miranda Gerard
Environmental Specialist
ADM Grain Company
4666 Faries Parkway
Decatur, Illinois 62526

Re: Public Notice
ADM Grain Company
Permit Level: FESOP - Renewal
Permit Number: 163-36835-00035

Dear Ms. Gerard:

Enclosed is a copy of your draft FESOP Renewal, 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 Vanderburgh Courier in Vanderburgh, Indiana publish the abbreviated version of the public notice no later than August 3, 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 Evansville Vanderburgh Public Library, 200 E. Martin Luther King Boulevard in Evansville, 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 Donald McQuigg, 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 4-4240 or dial (317) 234-4240.

Sincerely,

Vicki Biddle

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016

Indiana Department of Environmental Management
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Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 1, 2016

Vanderburgh Courier
P. O. Box 268
Evansville, Indiana 47702-0268

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for ADM Grain Company, Vanderburgh 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 August 3, 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 Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

Vicki Biddle

Vicki Biddle
Permit Branch
Office of Air Quality

Permit Level: FESOP - Renewal
Permit Number: 163-36835-00035

Enclosure

PN Newspaper.dot 2/17/2016

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 1, 2016

To: Evansville Vanderburgh 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: ADM Grain Company
Permit Number: 163-36835-00035

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 2/16/2016

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

August 1, 2016

FESOP - Renewal
163-36835-00035

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. 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

Mail Code 61-53

IDEM Staff	VBIDDLE 8/2/2016 ADM Grain Company 163-36835-00035 DRAFT		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Miranda Gerard ADM Grain Company 4666 Faries Pkwy Decatur IL 62526 (Source CAATS)									
2		Jeffrey J Becker VP - Operations Ag Services ADM Grain Company 4666 Faries Pkwy Decatur IL 62526 *(RO CAATS)*									
3		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 *(Local Official)*									
4		Evansville Vanderburg Public Library 200 SE Martin Luther King Jr. Blvd Evansville IN 47708-1694 *(Library)*									
5		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 *(Affected Party)*									
6		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 *(Health Department)*									
7		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 *(Affected Party)*									
8		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 *(Affected Party)*									
9		John Blair 800 Adams Ave Evansville IN 47713 *(Affected Party)*									
10											
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