

# 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 a
Signficant Modification to a
Part 70 Operating Permit
for Bunge North America (East), Inc. in Shelby County

Significant Source Modification No.: 145-36878-00035 Significant Permit Modification No.: 145-36883-00035

The Indiana Department of Environmental Management (IDEM) has received an application from Bunge North America (East), Inc., located at 700 N. Range Line Road, Morristown, IN 46161, for a significant modification of its Part 70 Operating Permit issued on July 1, 2016. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Bunge North America (East), Inc. to make certain changes at its existing source. Bunge North America (East), Inc. has applied for the incorporation of consent decree requirements outlined in Consent Decree No. 2:06-CV-02209-MPM-DGB, United States v. Bunge North America (East), LLC and others.

This draft Part 70 modification 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:

Shelbyville-Shelby County Public Library 57 West Broadway Shelbyville, IN 46176-1255

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

# How can you participate in this process?

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

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

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



that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit numbers SSM 145-36878-00035 and SPM 145-36883-00035 in all correspondence.

## Comments should be sent to:

Madhurima Moulik IDEM, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251 (800) 451-6027, ask for extension 3-0868 Or dial directly: (317) 233-0868 Fax: (317) 232-6749 attn: Madhurima Moulik

E-mail: mmoulik@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: <a href="http://www.in.gov/idem/5881.htm">http://www.in.gov/idem/5881.htm</a>; and the Citizens' Guide to IDEM on the Internet at: <a href="http://www.in.gov/idem/6900.htm">http://www.in.gov/idem/6900.htm</a>.

# 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, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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

Jason R. Krawczyk, Section Chief

Permits Branch Office of Air Quality



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Carol S. Comer

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# DRAFT

Ms. Maranda Mullis Bunge North America (East), Inc. 700 North Rangeline Road Morristown, IN 46161

Re: 145-36883-00035

Significant Permit Modification to

Part 70 Renewal No.: T145-36069-00035

Dear Ms. Mullis:

Bunge North America (East), Inc. was issued Part 70 Operating Permit Renewal No. T145-36069-00035 on July 1, 2016 for a stationary soybean processing plant located at 700 N. Range Line Road, Morristown, Indiana 46161. An application requesting changes to this permit was received on February 26, 2016. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

Attachment A: NSPS for Grain Elevators, Subpart DD

Attachment B: NSPS for Small Industrial-Commercial-Institutional Steam Generating Units,

Subpart Dc

Attachment C: NSPS for Industrial-Commercial-Institutional Steam Generating Units, Subpart

Db

Attachment D: NESHAP: Solvent Extractions for Vegetable Oil Production, Subpart GGGG

Attachment E: NESHAP for Industrial, Commercial, and Institutional Boilers and Process

Heaters, Subpart DDDDD

Attachment F: NESHAP for Stationary Reciprocating Internal Combustion Engines, Subpart

ZZZZ

Previously issued approvals for this source containing these attachments are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab 02.tpl.

A copy of the permit is available on the Internet at: <a href="http://www.in.gov/ai/appfiles/idem-caats/">http://www.in.gov/ai/appfiles/idem-caats/</a>. 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: <a href="http://www.in.gov/idem/5881.htm">http://www.in.gov/idem/5881.htm</a>; and the Citizens' Guide to IDEM on the Internet at: <a href="http://www.in.gov/idem/6900.htm">http://www.in.gov/idem/6900.htm</a>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.



Bunge North America (East), Inc. Morristown, Indiana Permit Reviewer: Madhurima Moulik Page 2 of 2 SPM No. 145-36883-00035

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If you have any questions on this matter, please contact Madhurima Moulik, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-233-0868 or 1-800-451-6027, and ask for extension 3-0868.

Sincerely,

Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality

Attachments: Modified Permit and Technical Support Document

cc: File - Shelby County

Shelby County Health Department

U.S. EPA, Region 5

Compliance and Enforcement Branch



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Commissioner

# Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY DRAFT

Bunge North America (East), Inc. 700 N. Range Line Road Morristown, Indiana 46161

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 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.

Operation Permit No.: T145-36069-00035	
Issued by: / Original Signed By:	
Jason R. Krawczyk, Section Chief	Issuance Date: July 1, 2016
Permits Branch	
Office of Air Quality	Expiration Date: July 1, 2021
Significant Permit Modification No.: 145-36883-00035	

Significant Permit Modification No.: 145-36883-00035			
Issued by:	Issuance Date:		
Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Expiration Date: July 1, 2021		



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Bunge North America (East), Inc. Significant Permit Modification No. 145-36883-00035 Morristown, Indiana Modified By: Madhurima Moulik

Permit Reviewer: Curtis Taylor/Madhurima Moulik

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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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary soybean processing plant.

Source Address: 700 N. Range Line Road, Morristown, Indiana 46161

General Source Phone Number: (765) 818-1100

SIC Code: 2075 (Soybean Oil Mills), 5153 (Grain and Field Beans)

County Location: Shelby

Source Location Status:

Source Status:

Attainment for all criteria pollutants
Part 70 Operating Permit Program
Major Source, under PSD Rules

Major Source, Section 112 of the Clean Air Act

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Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) Truck receiving operations, constructed in 1996, with a maximum throughput rate of 648 ton/hr, consisting of the following units, using the truck receiving/storage baghouse for particulate control, and exhausting at stack Pt #1:
  - (1) Two (2) truck dumps (#1 & #2);
  - (2) Two (2) truck receiving conveyors (#1 & #2);
  - (3) Two (2) receiving legs (#1 & #2), using the truck receiving/storage baghouse and oil applications;
  - (4) One (1) screen;
  - (5) Two (2) receiving legs (#1 & #2) extending from the screen;
  - (6) Two (2) screening conveyors;
  - (7) One (1) screening leg;
  - (8) One (1) screening leg;
  - (9) Two (2) conveyors (#1 & #2) extending to storage silos and to bulk storage;
  - (10) Two (2) conveyors extending to bulk storage feeding and continuing to the bulk storage silos;
  - (11) Ten (10) silos;
  - (12) One (1) screening bin;

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- (13) Two (2) bulk storage bins;
- (14) One (1) screening conveyor extending from the screening silo;
- (15) One (1) screening storage conveyor;
- (16) Two (2) totally enclosed screenings transfer conveyors arranged in a series, transferring screenings from the screenings storage conveyors to the screening bucket elevator;
- (17) One (1) screening bucket elevator, transferring screenings from the screenings transfer conveyors to the screenings surge bin;
- (18) Two (2) bulk storage return conveyors (#1 & #2) arranged in a series;
- (19) Two (2) conveyors from storage (#1 & #2);
- (20) One (1) conveyor extending to the surge bin leg;
- One (1) truck receiving/storage baghouse conveyor which transfers dust from the baghouse back to the screening leg;
- (22) Two (2) screens, identified as #4, with a total maximum throughput rate of 1,210 tons per hour;
- One (1) transfer system, identified as #9a, with a maximum throughput rate of 1,150 tons per hour, transferring soybeans from the bulk storage elevator to the bulk storage silos;
- One (1) enclosed whole bean conveyor, identified as #16a, with a maximum throughput rate of 340 tons per hour, conveying beans from the surge bin leg to the whole bean surge silo (#28a);
- One (1) whole bean surge silo, identified as #28a, with a maximum storage capacity of 40,000 bushels;
- One (1) enclosed conveyor, identified as #17a, with a maximum throughput rate of 40 tons per hour, conveying the dust from the truck receiving/storage baghouse to the screening leg;
- One (1) new bean screening screw conveyor, identified as #1a, with a maximum throughput rate of 36 tons per hour, transferring soybeans from the screening system (#4) to the screening leg baghouse;
- (28) Two (2) screening legs, identified as #7a;
- (29) Two (2) transfer conveyors aspirated to truck receiving/storage baghouse, identified as #13a; and

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(30) Four (4) aspirators between conveyor from storage, identified as #16, and surge bin leg, identified as #27, aspirated to truck receiving/storage baghouse.

Under 40 CFR 60, Subpart DD, these truck receiving operations are affected facilities.

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- (b) Rail receiving operations, constructed in 1996, with a maximum throughput rate of 400 ton/hr, consisting of the following units, using the truck receiving baghouse for particulate control, and exhausting at stack Pt #1:
  - (1) One (1) rail car dump; and
  - (2) One (1) rail car receiving conveyor;

Under 40 CFR 60, Subpart DD these rail receiving operations are affected facilities.

- (c) One (1) natural gas-fired column dryer, identified as column dryer, constructed in 1996, with a maximum throughput rate of 126 ton/hr, with a maximum heat input rating of 20 MMBtu/hr, exhausting at stack Pt #3;
- (d) Milling operations, constructed in 1996, with a maximum throughput rate of 99 ton/hr. consisting of the following units, using the RF filter baghouse for particulate control, and exhausting at stack Pt #4:
  - (1) One (1) soy bean scale with upper and lower scale garners;
  - (2) Six (6) cracking rolls with primary dehulling aspirators, using the primary aspiration cyclone and RF filter baghouse for control;
  - (3)Three (3) conveyors extending from the primary dehulling aspirators, with a maximum combined capacity of 100 tons per hour;
  - (4) Three (3) surge bins;
  - (5) Three (3) cracked bean conditioners;
  - (6)Three (3) conveyors extending from the cracked bean conditioners;
  - (7) Three (3) impactors with secondary dehulling aspirators, using the secondary aspiration cyclones and RF filter baghouse for control;
  - (8)One (1) primary aspiration cyclone;
  - (9)One (1) secondary aspiration cyclone;
  - (10)Two (2) hull refining screeners, exhausting to the hull refining cyclone;
  - Four (4) hull refining aspirators, exhausting to the hull refining cyclone; (11)
  - (12)One (1) hull refining cyclone;
  - (13)Two (2) millfeed grinders;
  - (14)Three (3) surge bins;
  - (15)One (1) meal screen;
  - (16)Two (2) hammer mills;
  - (17)Two (2) totally enclosed sized meal conveyors, in a series; and

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- (18)One (1) millfeed weight belt;
- (e) Flaking mill operations, constructed in 1996, and approved for modification in 2013, with a maximum throughput rate of 99 ton/hr, consisting of the following units, using the flaker aspiration baghouse, and exhausting at stack Pt #6:

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- (1) Nine (9) flakers; and
- (2) One (1) flake collecting conveyor;
- (f) One (1) flow coating material bin, with a maximum throughput rate of 30 ton/hr, using the flow coat receiving baghouse for particulate control, and exhausting at stack Pt #11;
- (g) Truck meal loadout operations, constructed in 1996, with a maximum throughput rate of 300 ton/hr, consisting of the following units, using the truck meal loadout baghouse, and exhausting at stack Pt #12:
  - (1) One (1) mixer, extending from the hull grinders;
  - (2) One (1) millfeed elevator leg;
  - (3)One (1) totally enclosed millfeed conveyor;
  - (4) Three (3) millfeed bins;
  - One (1) millfeed weigh belt; (5)
  - (6)One (1) meal conveyor extending from the coolers;
  - (7) One (1) DTDC unground meal conveyor extending to another set of conveyors;
  - (8) One (1) unground meal conveyor;
  - (9) One (1) feeder;
  - (10)One (1) flow coating material screw;
  - (11)One (1) mixing screw conveyor;
  - (12)One (1) production meal elevator;
  - (13)One (1) product meal conveyor #2;
  - (14)Six (6) meal storage bins;
  - (15)One (1) truck load out conveyor;
  - (16)One (1) truck loader; and
  - (17)One (1) truck scale;

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- (h) Rail meal loadout operations, constructed in 1996, with a maximum throughput rate of 300 ton/hr, consisting of the following units, using the rail meal loadout baghouse, and exhausting at stack Pt #13:
  - a rail load out conveyor;
  - (2) One (1) rail scale; and
  - (3) One (1) rail loader;
- (i) Oil extraction and processing operations, constructed in 1996, with a maximum throughput rate of 46 ton/hr, servicing Plant A, consisting of the following units:
  - (1) One (1) soybean oil extractor, using a mineral oil absorber for control, and exhausting at stack Pt #9;
  - (2) One (1) set of evaporators, using a mineral oil absorber for control, and exhausting at stack Pt #9;
  - One (1) desolventizer/toaster, using a mineral oil absorber for control, and exhausting at stack Pt #9;
  - One (1) set of condensers and water separators to separate hexane and water, using a mineral oil absorber for control, and exhausting at stack Pt #9;
  - (5) Two (2) mineral oil absorbers, using a mineral oil absorber for control, and exhausting at stack Pt #9;
  - (6) One (1) spent flake conveyor extending to the meal dryer;
  - (7) One (1) totally enclosed seal screw conveyor, installed in a series with the slurry loader conveyor;
  - (8) One (1) flake conveyor extending to the slurry loader conveyor;
  - (9) One (1) slurry loader conveyor;
  - (10) One (1) hexane storage tank, identified as #1 (storage);
  - (11) One (1) hexane storage tank, identified as #2 (process tank);
  - (12) One (1) hexane storage tank, identified as #3 (work/separation);

Under 40 CFR 63, Subpart GGGG, these oil extraction and processing operations are considered as part of an existing affected source.

- (j) Two (2) DTDC meal dryers (#1 & #2), both constructed in 1996, with a combined maximum throughput rate of 46 ton/hr, using a cyclone for control and exhausting at stack Pt #7;
- (k) One (1) cyclone for the control of the meal dryers, constructed in 1996, and exhausting at stack Pt #7;
- (I) Two (2) DTDC meal coolers (#1 & #2), both constructed in 1996, with a combined maximum throughput rate of 46 ton/hr, using a cyclone for control, and exhausting at stack Pt #8;

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- (m) One (1) cyclone for the control of the meal coolers, constructed in 1996, and exhausting at stack Pt #8;
- (n) One (1) boiler, identified as the Murray boiler (aka Boiler No. 1), constructed in 1996, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 96 million Btu per hour, exhausting to Murray Stack (aka Stack Pt #14).
  - Under 40 CFR 60, Subpart Dc, Murray boiler is an affected facility.
  - Under 40 CFR 63, Subpart DDDDD, Murray boiler is an affected source.
- (o) One (1) vegetable oil refinery process, constructed in 2002, with a maximum throughput rate of 60 ton/hr, consisting of crude vegetable oil receiving, storage, filtration, and degumming equipment; lecithin drying and processing equipment; oil refining, deodorizing, and filtration equipment; bulk oil handling, blending, storage, and loadout facilities; and including the following equipment:
  - (1) One (1) Silica storage silo, identified as R-101, equipped with a baghouse for particulate matter control, exhausting to Stack R-101;
  - One (1) Silica surge tank, identified as R-102, equipped with a baghouse for particulate matter control, exhausting to Stack R-102;
  - (3) One (1) Bleaching Clay storage silo, identified as R-103, equipped with a baghouse for particulate matter control, exhausting to Stack R-103;
  - (4) One (1) Bleaching Clay surge tank, identified as R-104, equipped with a baghouse for particulate matter control, exhausting to Stack R-104;
  - One (1) Filter Aid storage silo, identified as R-105, equipped with a baghouse for particulate matter control, exhausting to Stack R-105;
  - (6) One (1) Filter Aid surge tank, identified as R-106, equipped with a baghouse for particulate matter control, exhausting to Stack R-106; and
  - (7) One (1) natural gas-fired refinery boiler, identified as R-107, with a maximum heat input rating of 13 MMBtu/hr, exhausting to Stack R-107.
    - Under 40 CFR 63, Subpart DDDDD, R-107 is an affected source.
- (p) One (1) pelletizing mill, labeled as part of EU# 26, constructed in 1996, replaced in 2005, with a maximum rate of 36,000 lbs raw material per hour (18 tph), where air stream from mill does not vent to atmosphere but instead passes on to pellet cooler;
- (q) One (1) pellet cooler, labeled as part of EU# 26, constructed in 1996, replaced in 2005, with a maximum rate of 36,000 lbs raw material per hour (18 tph), using a high efficiency cyclone control device with a rating of 0.01 grains/dscf and 7,500 acfm at stack Pt#26;
- (r) One (1) totally enclosed drag conveyor, with a maximum rate of 18 tons per hour;
- (s) One (1) totally enclosed "L" path conveyor, with a maximum rate of 18 tons per hour; and
- (t) One (1) bucket leg, with a maximum rate of 18 tons per hour.

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- (u) One (1) screening bin, identified as #10a.
- (v) Three (3) totally enclosed conveyors to hull refining screener, identified as #25a.
- (w) One (1) totally enclosed dryer feed conveyor to the dryer feed elevator, identified as #29a.
- (x) Two (2) hull refining screeners, identified as #48a.
- (y) Four (4) hull refining aspirators, identified as #49a, exhausting to hull refining cyclone.
- (z) One (1) totally enclosed millfeed conveyor to storage, identified as #53a.
- (aa) One (1) millfeed elevator, identified as #54a, controlled by truck load out baghouse, and exhausting at stack Pt #12.
- (ab) One (1) seal screw conveyor, identified as #61a.
- (ac) The following emission units used in the one (1) totally enclosed sized meal conveyor, identified as #79a, aspirated to meal sizing system baghouse for control, and exhausting through stack Pt #24:
  - (1) One (1) enclosed meal screener feeder conveyor, identified as #74a, with a maximum throughput rate of 80 tons per hour, conveying the meal produced to the meal screen system.
  - (2) One (1) enclosed meal grinder feed conveyor, identified as #75a, with a maximum throughput rate of 80 tons per hour, conveying the meal from the meal screen system to meal feeders.
  - (3) One (1) meal grinding system, identified as #76, consisting of three (3) hammer mills, with a total maximum process rate of 80 tons per hour. This process rate is limited by the maximum throughput rate of the conveyors.
  - (4) Two (2) enclosed sized meal conveyors, identified as #78a, with a total maximum throughput rate of 80 tons per hour, conveying the ground meal from the meal grinding system (#76) to the meal handling system.
- (ad) Grain screening operations, with a maximum throughput rate of 724 ton/hr, consisting of the following units, using the screenings baghouse, and exhausting at stack Pt #5:
  - (1) One (1) screening surge bin;
  - (2) One (1) conveyor extending to the de-stoner;
  - (3) One (1) de-stoner, using a cyclone and the screening baghouse for control;
  - (4) One (1) screening grinder;
  - (5) Four (4) totally enclosed conveyors in a series, extending to the hull refining screener;
  - (6) One (1) cyclone exhausting to the screening baghouse;

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- (7) One (1) surge bin elevator;
- (8) One (1) whole bean surge bin;
- (9) One (1) dryer feed elevator;
- (10) One (1) totally enclosed dryer feed conveyor, transferring beans to the dryer feed elevator;

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- (11) Two (2) whole bean aspirators, in parallel;
- (12) One (1) dryer discharge conveyor;
- (13) One (1) day bin elevator;
- (14) Two (2) day bins;
- (15) Two (2) totally enclosed conveyors, arranged in a series;
- (16) Two (2) conveyors extending from the dryer to the dryer discharge conveyor;
- (17) One (1) milling elevator;
- (18) One (1) product meal conveyor, identified as #1
- (19) One (1) meal surge conveyor, identified as #2;
- (20) Three (3) meal storage silos;
- (21) One (1) load out leg conveyor;
- (22) One (1) load out meal elevator;
- (23) One (1) meal transfer conveyor; and
- (24) One (1) screening transfer conveyor to screenings bucket elevator.

The emission units listed in (ad)(1) through (16) are affected facilities under NSPS Subpart DD.

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- (ae) One (1) totally enclosed millfeed conveyor to storage, identified as #2b.
- (af) One (1) millfeed elevator, identified as #3b, exhausting at stack Pt #12.
- (ag) One (1) aspirator between milling leg and bean scale, identified as #4b, aspirated to milling baghouse, and exhausting at stack Pt #4.
- (ah) One (1) totally enclosed hull collecting conveyor, identified as #5b, feeding the "B" plant hull refining screener.
- (ai) One (1) "B" plant whole bean surge bin #2, identified as #6b.
- (aj) One (1) "B" plant hull grinder, identified as #7b, discharging to the screening baghouse, and exhausting at stack Pt #5.

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- (ak) One (1) "B" plant whole soybean feed bucket elevator, identified as #8b, controlled by the screening baghouse, and exhausting at stack Pt #5.
- (al) One (1) "B" plant totally enclosed bean heater discharge conveyor, identified as #9b.
- (am) One (1) "B" plant whole bean aspiration, identified as #10b, controlled by the screening baghouse, and exhausting at stack Pt #4.
- (an) One (1) "B" plant bean weighing system, identified as #11b, controlled by the screening baghouse, and exhausting at stack Pt #4.
- (ao) One (1)"B" plant totally enclosed millfeed grinding conveyor, identified as #12b, controlled by the screening baghouse, and exhausting at stack Pt #5.
- (ap) Two (2) "B" plant hull refining screeners, identified as #13b, controlled by the screening baghouse, and exhausting at stack Pt #5.
- (aq) Two (2) "B" plant aspirators, identified as #14b, controlled by a hull refining cyclone, and exhausting at stack Pt #18.
- (ar) One (1) "B" plant totally enclosed feed conveyor, identified as #15b.
- (as) One (1) "B" plant bean heater, identified as #16b, with a maximum throughput rate of 128 ton/hr, controlled by a bean heater cyclone, and exhausting at stack Pt # 25.
- (at) One (1) totally enclosed "B" plant soybean conveyor (feeding the jet dryers), identified as #17b, with a maximum throughput rate of 128 ton/hr, controlled by West Jet Dryer Baghouse, and exhausting at stack Pt # 18.
- (au) Two (2) jet dryers, identified as East Jet Dryer and West Jet Dryer (identified collectively as #18b), controlled by East Jet Dryer Baghouse and West Jet Dryer Baghouse, respectively, and exhausting at stack Pt # 18.
- (av) One (1) "B" plant bean heaters cyclone, identified as #19b, exhausting at stack Pt # 18A.
- (aw) One (1) "B" plant bean dryers cyclone, identified as #20b, exhausting at stack Pt # 18A.
- (ax) Two (2) "B" plant hulloosenators, identified as #21b.
- (ay) One (1) set of "B" plant cascade dryers, identified collectively as #22b, controlled by CCD cyclone, and exhausted at stack Pt #18.
- (az) One (1) set of "B" plant cracking rolls, identified as #23b.
- (ba) One (1) set of "B" plant cascade coolers, identified collectively as #24b, controlled by CCD cyclone, and exhausting at stack Pt # 18.
- (bb) Two (2) "B" plant totally enclosed after cascade coolers conveyors (feeding the flakers), identified as #25b, controlled by a soybean flaking baghouse, and exhausting at stack Pt #19.
- (bc) One (1) "B" plant cyclone, identified as #26b, exhausting at stack Pt # 18A.
- (bd) Oil extraction and processing operations, servicing Plant B, consisting of the following units:

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- (1) One (1) set of "B" plant flakers, identified as #27b, with a maximum throughput rate of 128 ton/hr, controlled by a flakers baghouse, and exhausting at stack Pt # 19.
- (2) One (1) "B" plant flakers baghouse, identified as #28b, exhausting at stack Pt # 19.
- (3) Two (2) "B" plant totally enclosed flake conveyors (feeding the seal conveyor), identified as #29b.
- (4) One (1) "B" plant totally enclosed seal screw conveyor (feeding the slurry loader conveyor), identified as #30b.
- (5) One (1) "B" plant totally enclosed slurry loader conveyor (feeding the extractor), identified as #31b.
- (6) One (1) "B" plant soybean oil extractor, identified as #32b, controlled by one (1) mineral oil absorption system, and exhausted at stack Pt # 23.
- (7) A set of "B" plant evaporators, identified as #33b, controlled by two (2) mineral oil absorption systems, and exhausted at stack Pt # 23.
- (8) A set of "B" plant condensers, hexane handling system and water separator to separate hexane and water, identified as #34b, controlled by one (1) mineral oil absorption system, and exhausted at stack Pt # 23.
- (9) One (1) "B" plant mineral oil absorption system with a mineral oil to control hexane emissions, identified as #35b, and exhausted at stack Pt # 23.
- (10) One (1) totally enclosed "B" plant spent flake conveyor, identified as #36b.

Under 40 CFR 63, Subpart GGGG, the oil extraction and processing operation is considered as part of an existing affected source.

- (be) Two (2) "B" plant meal dryers (#1 & #2), identified as #37b, with a combined maximum throughput rate of 46 ton/hr, controlled by one (1) dryer cyclone, and exhausting at stack Pt # 21.
- (bf) One (1) "B" plant meal cooler (#3), identified as #38b, with a maximum throughput rate of 46 ton/hr, controlled by one (1) cooler cyclone, and exhausting at stack Pt # 22.
- (bg) Four (4) "B" plant totally enclosed unground meal conveyors in series (meal screening system), with a maximum throughput rate of 80 ton/hr, identified as #39b.
- (bh) One (1) meal sizing baghouse, identified as #40b, exhausting at stack Pt #24.
- (bi) One (1) boiler, identified as Boiler No. 2, constructed in 2003, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 240 million Btu per hour, controlled by low NOx burners and flue gas recirculation, equipped with a continuous emission monitoring system (CEMS) for NOx, and exhausting at stack Pt # 20.
  - Under 40 CFR 60, Subpart Db, Boiler No. 2 is an affected facility.
  - Under 40 CFR 63, Subpart DDDDD, Boiler No. 2 is an affected source.
- (bj) One (1) screening leg, identified as #41b, transferring screenings from the screenings transfer conveyors to the screening surge bin.
- (bk) One (1) totally enclosed dryer feed conveyor, identified as #43b, transferring beans to the dryer feed elevator, controlled by screening baghouse, and exhausting at stack Pt #5.
- (bl) One (1) whole bean surge silos discharge conveyors feeding "B" Milling bucket elevator, identified as #49b, controlled by screenings baghouse and exhausting at stack Pt #5.
- (bm) One (1) "B" milling bucket elevator, identified as #50b, controlled by the Milling aspiration

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baghouse and exhausting at stack Pt #4.

- (bn) One (1) bean heater feed bucket elevator, identified as #51b, controlled by the screenings baghouse and exhausting at stack Pt #5.
- (bo) One (1) bean heater discharge bucket elevator, identified as #52b, controlled by the screenings baghouse and exhausting at stack Pt #5.
- One (1) screenings transfer conveyor to the cracking rolls, identified as #53b, controlled (bp) by East Jet Dryer Baghouse, and exhausting at stack Pt #18.
- (bq) One (1) hull grinder controlled screenings baghouse and exhausting at stack Pt #5.
- (br) One (1) "B" unground meal bucket elevator, identified as #55b, controlled by meal grinding baghouse at stack Pt #24.
- (bs) One (1) "B" DT feed conveyor, identified as #56b.
- (bt) One (1) "B" desolventizer toaster, identified as #57b, controlled by the mineral oil absorption system and exhausting at stack Pt #23.
  - Under 40 CFR 63, Subpart GGGG, #57b is considered as part of an existing affected source.
- (bu) One (1) "B" above ground hexane storage tank controlled by the mineral oil absorption system and exhausting at stack Pt #23.
  - Under 40 CFR 63, Subpart GGGG, the above ground hexane storage tank is considered as part of an existing affected source.
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling (a)
- Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other (b) air filtration equipment;
- (c) Emission units with PM and PM10 emissions less than five (5) tons per year, SO<sub>2</sub>, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
  - (1) One (1) #2 fuel oil storage tank, identified as #4, with a capacity of 3,958 cubic feet:
  - (2) One (1) soybean oil storage tank, identified as #6, with a capacity of 38,000 cubic
  - (3)One (1) soybean oil storage tank, identified as #7, with a capacity of 38,000 cubic feet:

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- (4) One (1) #2 fuel oil storage tank, identified as #10, with a capacity of 3,958 cubic feet; and
- (d) Emergency fire pumps as follows:
  - (1) One (1) diesel-fired emergency fire pump, constructed in January 1996, identified as Fire Pump #1, with a rating of 443 HP, using no control.
  - One (1) diesel-fired emergency fire pump, constructed in December 1995, identified as Fire Pump #2, with a rating of 443 HP, using no control.
  - One (1) diesel-fired emergency fire pump, constructed in September 2002, identified as Fire Pump #3, with a rating of 575 HP, using no control.
  - (4) One (1) diesel-fired emergency fire pump, constructed in October 2002, identified as Fire Pump #4, with a rating of 575 HP, using no control.
- (e) Eight (8) natural gas-fired space heaters, identified as H1 through H8, with a total maximum heat input capacity of 2.2 MMBtu/hr; and
- (f) Paved and parking lots with public access.
- (g) One (1) Graymills scrub station (parts washer), constructed in 2000, with a maximum annual solvent usage of 40 gallons per year.

# A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

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# **SECTION B**

# **GENERAL CONDITIONS**

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### B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- This permit, T145-36069-00035, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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:

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

### **B.4** Enforceability [326 IAC 2-7-7][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 2-7-5(5)]

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 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- 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.
- For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a (b) 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 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

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- (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.
- A "responsible official" is defined at 326 IAC 2-7-1(35). (c)

### B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (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 2-7-5(3); and
  - Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may (5) require to determine the compliance status of the source.

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The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

### B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - Identification and quantification of the replacement parts that will be maintained (3)in inventory for quick replacement.

The Permittee shall implement the PMPs.

- If required by specific condition(s) in Section D of this permit where no PMP was (b) 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
  - Identification and quantification of the replacement parts that will be maintained (3)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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a (c) 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation (d) 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.11 Emergency Provisions [326 IAC 2-7-16]

- 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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3)During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM. OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered:

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,

Compliance and Enforcement Branch), or

Telephone Number: 317-233-0178 (ask for Office of Air Quality,

Compliance and Enforcement Branch) Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(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.

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The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 2-7-4(c)(8) 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 2-7 and any other applicable rules.
- (g) 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.

# B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to

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be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

# B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T145-36069-00035 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

# B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

- B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]
  - (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

# B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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 2-7-4. 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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# B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]
  - (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
  - (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

# B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (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 preconstruction approval required by 326 IAC 2-7-10.5 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

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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

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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 2-7-20(b)(1) and (c)(1). 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 2-7-20(b)(1) and (c)(1).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2)The date on which the change will occur;
  - (3)Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(c)] 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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)] 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 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- Backup fuel switches specifically addressed in, and limited under, Section D of this permit (e) shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

### Source Modification Requirement [326 IAC 2-7-10.5] B.20

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# B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

# B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within 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.

Bunge North America (East), Inc.

Significant Permit Modification No. 145-36883-00035

Morristown, Indiana

Modified By: Madhurima Moulik

Permit Reviewer: Curtis Taylor/Madhurima Moulik

(b) Except as provided in 326 IAC 2-7-19(e), 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.

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# B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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.

Morristown, Indiana Modified By: Madhurima Moulik Permit Reviewer: Curtis Taylor/Madhurima Moulik

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

**Entire Source** 

# Emission Limitations and Standards [326 IAC 2-7-5(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.

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### C.2 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:

- Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute (a) averaging period as determined in 326 IAC 5-1-4.
- Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (b) (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.3 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.4 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.5 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), 326 IAC 6-4-2(4) is not federally enforceable.

### C.6 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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

Notification requirements apply to each owner or operator. If the combined amount of (a) 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.

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- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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# Testing Requirements [326 IAC 2-7-6(1)]

# C.8 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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 2-7-5(1)][326 IAC 2-7-6(1)]

# C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (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:

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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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

# C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(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 2-7-5][326 IAC 2-7-6]

# C.12 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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# C.13 Risk Management Plan [326 IAC 2-7-5(11)][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 [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]
  - (I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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:
      - 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.

(II)

- (a) CAM Response to excursions or exceedances.
  - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal

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without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:
  The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
  - Failed to address the cause of the control device performance problems;
     or
  - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) CAM recordkeeping requirements.
  - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality

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improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

#### C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

# Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

  Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue MC 61-50 IGCN 1003 Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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# C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6][326 IAC 2-2][326 IAC 2-3]

- (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 Part 70 permit.

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) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
  - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(00) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;

Bunge North America (East), Inc.

Significant Permit Modification No. 145-36883-00035

Morristown, Indiana

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- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
  - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.
- C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][326 IAC 2-2][326 IAC 2-3][40 CFR 64][326 IAC 3-8]
  - (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken:
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon

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completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

(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.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
  - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
  - (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

Bunge North America (East), Inc.

Significant Permit Modification No. 145-36883-00035

Morristown, Indiana

Significant Permit Modification No. 145-36883-00035

Modified By: Madhurima Moulik

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(g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

# **Stratospheric Ozone Protection**

# C.19 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

#### **Emission Unit Description:**

- (a) Truck receiving operations, constructed in 1996, with a maximum throughput rate of 648 ton/hr, consisting of the following units, using the truck receiving/storage baghouse for particulate control, and exhausting at stack Pt #1:
  - (1) Two (2) truck dumps (#1 & #2);
  - (2) Two (2) truck receiving conveyors (#1 & #2);
  - (3) Two (2) receiving legs (#1 & #2), using the truck receiving/storage baghouse and oil applications;
  - (4) One (1) screen;
  - (5) Two (2) receiving legs (#1 & #2) extending from the screen;
  - (6) Two (2) screening conveyors;
  - (7) One (1) screening leg;
  - (8) One (1) screening leg;
  - (9) Two (2) conveyors (#1 & #2) extending to storage silos and to bulk storage;
  - (10) Two (2) conveyors extending to bulk storage feeding and continuing to the bulk storage silos;
  - (11) Ten (10) silos;
  - (12) One (1) screening bin;
  - (13) Two (2) bulk storage bins;
  - (14) One (1) screening conveyor extending from the screening silo;
  - (15) One (1) screening storage conveyor;
  - (16) Two (2) totally enclosed screenings transfer conveyors arranged in a series, transferring screenings from the screenings storage conveyors to the screening bucket elevator:
  - (17) One (1) screening bucket elevator, transferring screenings from the screenings transfer conveyors to the screenings surge bin;
  - (18) Two (2) bulk storage return conveyors (#1 & #2) arranged in a series;
  - (19) Two (2) conveyors from storage (#1 & #2);
  - (20) One (1) conveyor extending to the surge bin leg;
  - One (1) truck receiving/storage baghouse conveyor which transfers dust from the baghouse back to the screening leg;

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- (22) Two (2) screens, identified as #4, with a total maximum throughput rate of 1,210 tons per hour;
- (23) One (1) transfer system, identified as #9a, with a maximum throughput rate of 1,150 tons per hour, transferring soybeans from the bulk storage elevator to the bulk storage silos;
- One (1) enclosed whole bean conveyor, identified as #16a, with a maximum throughput rate of 340 tons per hour, conveying beans from the surge bin leg to the whole bean surge silo (#28a);
- One (1) whole bean surge silo, identified as #28a, with a maximum storage capacity of 40,000 bushels;
- One (1) enclosed conveyor, identified as #17a, with a maximum throughput rate of 40 tons per hour, conveying the dust from the truck receiving/storage baghouse to the screening leg;
- One (1) new bean screening screw conveyor, identified as #1a, with a maximum throughput rate of 36 tons per hour, transferring soybeans from the screening system (#4) to the screening leg baghouse;
- (28) Two (2) screening legs, identified as #7a;
- (29) Two (2) transfer conveyors aspirated to truck receiving/storage baghouse, identified as #13a; and

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(30) Four (4) aspirators between conveyor from storage, identified as #16, and surge bin leg, identified as #27, aspirated to truck receiving/storage baghouse.

Under 40 CFR 60, Subpart DD, these truck receiving operations are affected facilities.

- (b) Rail receiving operations, constructed in 1996, with a maximum throughput rate of 400 ton/hr, consisting of the following units, using the truck receiving baghouse for particulate control, and exhausting at stack Pt #1:
  - (1) One (1) rail car dump; and
  - (2) One (1) rail car receiving conveyor;

Under 40 CFR 60, Subpart DD these rail receiving operations are affected facilities.

(c) One (1) natural gas-fired column dryer, identified as column dryer, constructed in 1996, with a maximum throughput rate of 126 ton/hr, with a maximum heat input rating of 20 MMBtu/hr, exhausting at stack Pt #3;

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

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# Emission Limitations and Standards [326 IAC 2-7-5(1)]

# D.1.1 PSD Minor Limit [326 IAC 2-2]

(a) Pursuant to SSM145-9618-00035, as modified in T145-36069-00035, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following PM and PM10 emissions:

Process	Baghouse	PM Limit (lb/hr)	PM10 Limit (lb/hr)
Grain receiving system, whole bean transfer, receiving and screening system (including truck and rail)	Pt #1	5.59	2.28

(b) Fugitive emissions shall be controlled by keeping paved roads free of particulate matter with a vacuum or wet sweeper.

Compliance with these limits shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to SSM No. 145-9618-00035.

#### D.1.2 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the following units shall be limited as follows when operating at the listed process weight rate:

Emission Unit	Process Weight Rate (tons/hr)	PM Emission Limit (lb/hr)	
Truck receiving Operations (Pt#1)	648	72.1	
Rail Receiving & Conveying (Pt #1)	400	66.3	
column dryer (Pt #3)	126	53.6	

These limitations were calculated using the following:

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

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

#### Compliance Determination Requirements [326 IAC 2-7-5(1)]

# D.1.3 Particulate Control [326 IAC 2-7-6(6)]

In order to assure compliance with Condition D.1.1, the following requirements apply:

- (a) The baghouse for truck receiving/storage and rail car receiving/storage shall be in operation at all times those facilities are in operation.
- (b) Dust control oil shall be applied at the starting end of the truck and rail car receiving conveyors at all times these conveyors are in operation, at a rate determined at the time of PM compliance tests performed as required by CP-145-4300-00035.
- (c) 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

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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.1.4 Testing Requirements [326 IAC 2-7-6(1), (6)][326 IAC 2-1.1-11][326 IAC 2-2][326 IAC 3]

In order to demonstrate compliance with Condition D.1.1, the Permittee shall perform Opacity, PM and PM-10 testing on receiving baghouse (Pt # 1) utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 contains filterable and condensable particulate matter.

#### Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

#### D.1.5 Visible Emissions Notations

- (a) Once per day visible emission notations of Pt #1 and Pt #3 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. 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.1.6 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 indicted by a significant drop in the baghouses 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.

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# Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)][326 IAC 2-7-19]

# D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain records of once per day visible emission notations of the stack exhaust from Pt #1 and Pt #3. 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 truck receiving, rail receiving and/or the rail screening did not operate that day).
- (b) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

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# SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

#### **Emission Unit Description:**

- (d) Milling operations, constructed in 1996, with a maximum throughput rate of 99 ton/hr, consisting of the following units, using the RF filter baghouse for particulate control, and exhausting at stack Pt #4:
  - (1) One (1) soy bean scale with upper and lower scale garners;
  - (2) Six (6) cracking rolls with primary dehulling aspirators, using the primary aspiration cyclone and RF filter baghouse for control;
  - (3) Three (3) conveyors extending from the primary dehulling aspirators, with a maximum combined capacity of 100 tons per hour;
  - (4) Three (3) surge bins;
  - (5) Three (3) cracked bean conditioners;
  - (6) Three (3) conveyors extending from the cracked bean conditioners;
  - (7) Three (3) impactors with secondary dehulling aspirators, using the secondary aspiration cyclones and RF filter baghouse for control;
  - (8) One (1) primary aspiration cyclone;
  - (9) One (1) secondary aspiration cyclone;
  - (10) Two (2) hull refining screeners, exhausting to the hull refining cyclone;
  - (11) Four (4) hull refining aspirators, exhausting to the hull refining cyclone;
  - (12) One (1) hull refining cyclone;
  - (13) Two (2) millfeed grinders;
  - (14) Three (3) surge bins;
  - (15) One (1) meal screen;
  - (16) Two (2) hammer mills;
  - (17) Two (2) totally enclosed sized meal conveyors, in a series; and
  - (18) One (1) millfeed weight belt;
- (e) Flaking mill operations, constructed in 1996, and approved for modification in 2013, with a maximum throughput rate of 99 ton/hr, consisting of the following units, using the flaker aspiration baghouse, and exhausting at stack Pt #6:
  - (1) Nine (9) flakers; and
  - (2) One (1) flake collecting conveyor;
- (f) One (1) flow coating material bin, with a maximum throughput rate of 30 ton/hr, using

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T145-36069-00035 Permit Reviewer: Curtis Taylor/Madhurima Moulik DRAFT the flow coat receiving baghouse for particulate control, and exhausting at stack Pt #11; (g) Truck meal loadout operations, constructed in 1996, with a maximum throughput rate of 300 ton/hr, consisting of the following units, using the truck meal loadout baghouse, and exhausting at stack Pt #12: (1) One (1) mixer, extending from the hull grinders; (2) One (1) millfeed elevator leg; (3)One (1) totally enclosed millfeed conveyor: (4) Three (3) millfeed bins; (5) One (1) millfeed weigh belt; One (1) meal conveyor extending from the coolers; (6) (7) One (1) DTDC unground meal conveyor extending to another set of conveyors; (8) One (1) unground meal conveyor; (9)One (1) feeder; (10)One (1) flow coating material screw; (11)One (1) mixing screw conveyor; (12)One (1) production meal elevator; (13)One (1) product meal conveyor #2: (14)Six (6) meal storage bins; (15)One (1) truck load out conveyor; (16)One (1) truck loader; and (17)One (1) truck scale; (h) Rail meal loadout operations, constructed in 1996, with a maximum throughput rate of 300 ton/hr, consisting of the following units, using the rail meal loadout baghouse, and

- exhausting at stack Pt #13:
  - (1) a rail load out conveyor;
  - (2) One (1) rail scale; and
  - (3) One (1) rail loader;

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

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# Emission Limitations and Standards [326 IAC 2-7-5(1)]

# D.2.1 PSD Minor Limit [326 IAC 2-2]

(a) Pursuant to SSM145-9618-00035 as modified in T145-36069-00035 and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following PM and PM10 emissions:

Process	Baghouse/ Cyclone	PM Limit (lb/hr)	PM10 Limit (lb/hr)
Milling operations	Pt #4	1.3	1.3
Flaking mill operations	Pt #6	0.69	0.90
Flow coating bin	Pt #11	0.026	0.026
Truck meal loadout operations	Pt #12	1.65	1.65
Rail meal loadout operations	Pt #13	0.10	0.10

(b) Fugitive emissions shall be controlled by keeping paved roads free of particulate matter with a vacuum or wet sweeper.

Compliance with these limits shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to SSM No. 145-9618-00035.

# D.2.2 Opacity

Pursuant to CP-A145-9458-00035, issued on June 9, 1998, visible emissions from the flow coat receiving baghouse and rail meal loadout baghouse shall not exceed 5% opacity.

#### D.2.3 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the following units shall be limited as follows when operating at the listed process weight rate:

Emission Unit	Process Weight Rate (tons/hr)	PM Emission Limit (lb/hr)
Milling Operations (Pt #4)	99	51.2
A Flaking & Conveying (Pt #6)	99	51.2
Flow coating material bin (Pt #11)	30	40
Truck meal loadout operations (Pt #12)	300	63
Rail meal loadout operations (Pt #13)	300	63

These limitations were calculated using the following:

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

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

and

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

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

#### Compliance Determination Requirements [326 IAC 2-7-5(1)]

# D.2.4 Particulate Control [326 IAC 2-7-6(6)]

In order to assure compliance with Conditions D.2.1, D.2.2, and D.2.3, the following conditions apply:

- (a) The truck and rail receiving operations, flaking mill, flow coating material bin operations, truck meal loadout, and rail meal loadout baghouses shall be in operation at all times that their respective facilities are in operation.
- (b) The primary aspiration, secondary aspiration, and hull refining cyclones shall be in operation at all times that their respective facilities are in operation.
- (c) 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.2.5 Testing Requirements [326 IAC 2-7-6(1), (6)][326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.2.1 and D.2.3, the Permittee shall perform PM and PM $_{10}$  testing for the Flaking Mill Operation baghouse, utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM $_{10}$  includes filterable and condensable particulate matter.

# Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

#### D.2.6 Visible Emissions Notations [40 CFR Part 64]

- (a) Once per day visible emission notations of milling operations (Pt #4), flow coating material bin operations (Pt #11) and truck meal loadout operations (Pt #12) stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. 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.

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(e) If abnormal emissions are observed, the Permittee shall take a reasonable 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.2.7 Visible Emissions Notations

- (a) Once per day visible emission notations of the rail meal loadout operations (Pt #13) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. 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.2.8 Parametric Monitoring [40 CFR Part 64]

- (a) Alarms shall be operational on all cyclone high level indicators. If an alarm sounds, the Permittee shall take a reasonable 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.
- (b) The Permittee shall record the pressure drop across the baghouses used in conjunction with the milling operations (Pt #4), flow coating material bin operations (Pt #11) and truck meal loadout operations (Pt #12) at least once per day when the listed processes are in operation. When for any one reading, the pressure drop across the baghouses is outside of the normal range, the Permittee shall take a reasonable response. The normal range for these units is a pressure drop between 0.5 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response 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.

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.

#### D.2.9 Parametric Monitoring

(a) Alarms shall be operational on all cyclone high level indicators. If an alarm sounds, the Permittee shall take a reasonable 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.

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(b) The Permittee shall record the pressure drop across the baghouses used in conjunction with the flaking mill operations (Pt #6) and rail meal loadout operations (Pt #13) at least once per day when the listed processes are in operation. When for any one reading, the pressure drop across the baghouses is outside of the normal range, the Permittee shall take a reasonable response. The normal range for these units is a pressure drop between 0.5 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response 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.

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.

#### D.2.10 Broken or Failed Bag Detection

- 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 indicted by a significant drop in the baghouses 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.

# D.2.11 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have 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). Failure to take a reasonable response shall be considered a deviation from this permit.

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# Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)][326 IAC 2-7-19]

# D.2.12 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.2.6 and D.2.7, the Permittee shall maintain records of once per day visible emission notations of the stack exhaust from milling operations (Pt #4), flow coating material bin operations (Pt #11), truck meal loadout operations (Pt #12), and rail meal loadout operations (Pt #13) 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 milling operations, flaking meal operations, flow coating material bin operations, truck meal loadout operations and/or the rail meal loadout operations did not operate that day).
- (b) To document the compliance status with Conditions D.2.8 and D.2.9, the Permittee shall maintain records of the pressure drops across the baghouses. The Permittee shall also maintain records of any alarms that sound and the response taken. 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 milling operations, flaking meal operations, flow coating material bin operations, truck meal loadout operations and/or the rail meal loadout operations did not operate that day).
- (c) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

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#### **EMISSION UNIT OPERATION CONDITIONS SECTION D.3**

# **Emission Unit Description:**

- Oil extraction and processing operations, constructed in 1996, with a maximum (i) throughput rate of 46 ton/hr, servicing Plant A, consisting of the following units:
  - One (1) soybean oil extractor, using a mineral oil absorber for control, and (1) exhausting at stack Pt #9;

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- One (1) set of evaporators, using a mineral oil absorber for control, and (2) exhausting at stack Pt #9;
- (3)One (1) desolventizer/toaster, using a mineral oil absorber for control, and exhausting at stack Pt #9;
- (4) One (1) set of condensers and water separators to separate hexane and water, using a mineral oil absorber for control, and exhausting at stack Pt #9;
- Two (2) mineral oil absorbers, using a mineral oil absorber for control, and (5) exhausting at stack Pt #9;
- (6)One (1) spent flake conveyor extending to the meal dryer:
- One (1) totally enclosed seal screw conveyor, installed in a series with the (7) slurry loader conveyor;
- (8) One (1) flake conveyor extending to the slurry loader conveyor;
- (9)One (1) slurry loader conveyor;
- (10)One (1) hexane storage tank, identified as #1 (storage);
- (11)One (1) hexane storage tank, identified as #2 (process tank);
- One (1) hexane storage tank, identified as #3 (work/separation); (12)

Under the Solvent Extraction for Vegetable Oil Production NESHAP (40 CFR 63, Subpart GGGG), these are considered as part of an existing affected source.

- (j) Two (2) DTDC meal dryers (#1 & #2), both constructed in 1996, with a combined maximum throughput rate of 46 ton/hr, using a cyclone for control and exhausting at stack Pt #7;
- (k) One (1) cyclone for the control of the meal dryers, constructed in 1996, and exhausting at stack Pt #7;
- Two (2) DTDC meal coolers (#1 & #2), both constructed in 1996, with a combined (l) maximum throughput rate of 46 ton/hr, using a cyclone for control, and exhausting at stack Pt #8:
- (m) One (1) cyclone for the control of the meal coolers, constructed in 1996, and exhausting at stack Pt #8;

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

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#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

# D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The soybeans processed by the "A" plant, on an "as received" basis, shall be limited to less than 828,837 tons per twelve (12) consecutive month period (equivalent to an oil extraction process throughput of 803,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) applies to the soy bean extractor processes, meal dryers, and coolers. Pursuant to CP145-4300-00035, issued July 17, 1995, and 326 IAC 8-1-6, the following is BACT and these limitations apply:

Facility	Control	VOC (Hexane) Emission Limit (including upset emissions)		
Oil Extractor, Meal Desolventizer, Oil Desolventizer, Solvent Separator, Vent System	Mineral oil absorber	0.12 lb/ton of processed grain		
Meal Dryers	None	0.16 lb/ton of processed grain		
Meal Coolers	None	0.16 lb/ton of processed grain		
Maximum soybean extraction process throughput = 803,000 tons per twelve (12) consecutive month period				

The total amount of hexane used by the source shall not exceed 1.2 pounds of hexane per ton of beans processed. This limit is based on information from the Technical Support Document for CP 145-4300-00035, issued on July 17, 1995 and is equivalent to 481.8 tons of hexane per twelve (12) consecutive month period. Compliance with this limit is equivalent to VOC emissions of less than 176.7 tons per year. Compliance with this hexane usage limit, in addition to the limits listed in the table above, will satisfy the requirements of 326 IAC 8-1-6 (BACT).

#### D.3.2 PSD Minor Limit [326 IAC 2-2]

Pursuant to SSM145-9618-00035 as modified in T145-36069-00035 and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following PM and PM10 emissions:

Process	Baghouse/ Cyclone	PM Limit (lb/hr)	PM10 Limit (lb/hr)
DTDC meal dryers, #1 and #2	Pt #7	3.8	4.29
DTDC meal coolers, #1 and #2	Pt #8	5.7	5.7

Compliance with these limits shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to SSM No. 145-9618-00035.

# D.3.3 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the following units shall be limited as follows when operating at the listed process weight rate:

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Emission Unit	Process Weight Rate (tons/hr)	PM Emission Limit (lb/hr)	
DTDC meal dryers, #1 and #2 (Pt #7)	46	43.8	
DTDC meal coolers, #1 and #2 (Pt #8)	46	43.8	

These limitations were calculated using the following:

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

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

# Compliance Determination Requirements [326 IAC 2-7-5(1)]

#### D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform VOC testing on the DTDC meal dryers, #1 and #2 (Pt #7) and DTDC meal coolers, #1 and #2 (Pt #8) utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures-Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

#### D.3.5 Particulate Control [326 IAC 2-7-6(6)]

In order to assure compliance with Conditions D.3.2 and D.3.3, the cyclones for the meal dryers and coolers shall operate at all times that those facilities are in operation.

#### D.3.6 Volatile Organic Compounds (VOC) [40 CFR Part 64]

In order to assure compliance with Condition D.3.1, the mineral oil absorber for the A Oil extraction and processing operations, DTDC meal dryers (#1 & #2), and DTDC meal coolers (#1 & #2) shall operate at all times that the A Oil extraction and processing operations, DTDC meal dryers (#1 & #2), and DTDC meal coolers (#1 & #2) are in operation.

# Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

#### D.3.7 Visible Emissions Notations

- (a) Once per day visible emission notations of meal dryers (Pt #7) and meal coolers (Pt #8) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. 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.

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(e) If abnormal emissions are observed, the Permittee shall take a reasonable 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.3.8 VOC Monitoring [40 CFR Part 64]

In order to assure compliance with Condition D.3.1, the following monitoring requirements apply:

- (a) The Permittee shall monitor and record the mineral oil flow rate at least once per day when the mineral oil absorbers are in operation. When the mineral oil flow rate reading is below the minimum mineral oil flow rate for any one reading the Permittee shall take a reasonable response. The minimum mineral oil flow rate to the mineral oil absorber will be as recommended by the manufacturer or the minimum flow rate established during the latest stack test. The Preventive Maintenance Plan for the absorber shall contain troubleshooting contingency and corrective actions for when the flow rate readings are outside of the normal range for any one reading. Section C Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. A flow rate that is below the above mentioned rate is not a deviation from this permit. Failure to take a reasonable response shall be considered a deviation from this permit.
- (b) The instruments used for determining the flow rate shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every eighteen (18) months.
- (c) The gauge employed to take the mineral oil flow across the scrubber shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within + 10% of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.
- (d) In the event that the absorber's failure has been observed, an inspection will be conducted. Based upon the findings of the inspection, any corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.
- (e) The mineral oil to the mineral-oil-stripping column shall be kept at a minimum temperature of 160 °F or a temperature for adequate stripping of the absorbed hexane from the oil. When the process is in operation, an electronic data management system (EDMS) shall record the instantaneous temperature on a frequency of not less than every two hours. As an alternative to installing an EDMS, manual readings shall be taken every two hours.

#### D.3.9 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have 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). Failure to take a reasonable response shall be considered a deviation from this permit.

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

#### D.3.10 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.1, the Permittee shall maintain records of the quantity of soybeans processed and the amount of VOC (hexane) used per calendar month.

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(b) To document the compliance status with Condition D.3.7, the Permittee shall maintain records of visible emission notations of the stack exhaust once per day. 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 meal dryers did not operate that day).

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- (c) To document the compliance status with Condition D.3.8, the Permittee shall maintain records of the following:
  - (1) The mineral oil flow rate;
  - (2) The events of the absorber's failure, findings of the inspections subsequent to absorber's failure, the corrective actions taken, and the time table for completion;
  - (3) The operating temperature of the mineral oil absorber; and
  - (4) The temperature of the stripping column.
- (d) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

# D.3.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.3.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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#### **EMISSION UNIT OPERATION CONDITIONS SECTION D.4**

# **Emission Unit Description:**

One (1) boiler, identified as the Murray boiler (aka Boiler No. 1), constructed in 1996, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 96 million Btu per hour, exhausting to Murray Stack (aka Stack Pt #14).

Under 40 CFR 60, Subpart Dc, Murray boiler is an affected facility.

Under 40 CFR 63, Subpart DDDDD, Murray boiler is an affect source.

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

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the 96 MMBtu/hr boiler, identified as Murray Boiler, shall be limited to 0.33 pounds per million Btu heat input.

# Sulfur Dioxide (SO<sub>2</sub>) and Opacity [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1-2(a)(3) (Sulfur Dioxide Emissions Limitations), the SO<sub>2</sub> emissions from the Murray boiler shall not exceed five tenths (0.5) pounds per million Btu heat input, when firing fuel oil. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month

# Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

#### Visible Emissions Notations

- Visible emission notations of the boiler stack exhaust shall be performed once per day (a) during normal daylight operations when combusting fuel oil and/or vegetable oil and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. 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.

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# Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

#### D.4.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.4.2, the Permittee shall maintain records in accordance with (1) through (6) below.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
  - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document the compliance status with Condition D.4.4, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust once per day. 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., boiler did not operate that day).
- (c) Section C General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

#### D.4.5 Reporting Requirements

The natural gas boiler certification shall be submitted using the reporting form located at the end of this permit, or its equivalent, not later than thirty (30) days after the end of the six (6) month period 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 do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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# SECTION D.5 EMISSION UNIT OPERATION CONDITIONS

#### **Emission Unit Description:**

- (o) One (1) vegetable oil refinery process, constructed in 2002, with a maximum throughput rate of 60 ton/hr, consisting of crude vegetable oil receiving, storage, filtration, and degumming equipment; lecithin drying and processing equipment; oil refining, deodorizing, and filtration equipment; bulk oil handling, blending, storage, and loadout facilities; and including the following equipment:
  - (1) One (1) Silica storage silo, identified as R-101, equipped with a baghouse for particulate matter control, exhausting to Stack R-101;
  - One (1) Silica surge tank, identified as R-102, equipped with a baghouse for particulate matter control, exhausting to Stack R-102;
  - (3) One (1) Bleaching Clay storage silo, identified as R-103, equipped with a baghouse for particulate matter control, exhausting to Stack R-103;
  - (4) One (1) Bleaching Clay surge tank, identified as R-104, equipped with a baghouse for particulate matter control, exhausting to Stack R-104;
  - One (1) Filter Aid storage silo, identified as R-105, equipped with a baghouse for particulate matter control, exhausting to Stack R-105;
  - (6) One (1) Filter Aid surge tank, identified as R-106, equipped with a baghouse for particulate matter control, exhausting to Stack R-106; and
  - (7) One (1) natural gas-fired refinery boiler, identified as R-107, with a maximum heat input rating of 13 MMBtu/hr, exhausting to Stack R-107.

Under 40 CFR 63, Subpart DDDDD, R-107 is an affected source;

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

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

# D.5.1 PSD Minor Limit [326 IAC 2-2]

Pursuant to SSM 145-9618-00035 and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall be limited by the following:

Process	Baghouse/	PM Limit (lb/hr)
	Cyclone	
R-101 through R-106	R-101 - R-106	1.029
_		(combined)

Compliance with these limits shall render the requirements of 326 IAC 2-2 ((Prevention of Significant Deterioration (PSD)) not applicable to SSM No. 145-9618-00035.

#### D.5.2 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the following units shall be limited as follows when operating at the listed process weight rate:

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Emission Unit	Process Weight Rate (tons/hr)	PM Emission Limit (lb/hr)	
vegetable oil refinery process (R-101 through R-106)	60	46.3	

These limitations were calculated using the following:

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

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

# Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating), the particulate emissions from refinery boiler, identified as R-107, shall be limited to less than 0.32 pounds per million British thermal units per hour heat input.

### Compliance Determination Requirements [326 IAC 2-7-5(1)]

#### D.5.4 Particulate Control [326 IAC 2-7-6(6)]

In order to assure compliance with Conditions D.5.1 and D.5.2, the baghouses for particulate control shall be in operation and control emissions from the storage silos and surge tanks, identified as R-101 through R-106, at all times when the storage silos and surge tanks are in operation.

# Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

#### Visible Emissions Notations [40 CFR Part 64] D.5.5

- Once per day visible emission notations of the R-101 through R-106 stack exhausts shall (a) be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- For processes operated continuously, "normal" means those conditions prevailing, or (b) 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.
- If abnormal emissions are observed, the Permittee shall take a reasonable response. (e) 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.

# Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)][326 IAC 2-7-19]

#### D.5.6 Record Keeping Requirements

To document the compliance status with Condition D.5.5 the Permittee shall maintain records of once per day visible emission notations of the stack exhaust from the storage Bunge North America (East), Inc.

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silos and surge tanks, identified as R-101 through R-106. 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 storage silos and surge tanks did not operate that day).

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

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**SECTION D.6** 

#### **EMISSION UNIT OPERATION CONDITIONS**

# **Emission Unit Description:**

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- (p) One (1) pelletizing mill, labeled as part of EU# 26, constructed in 1996, replaced in 2005, with a maximum rate of 36,000 lbs raw material per hour (18 tph), where air stream from mill does not vent to atmosphere but instead passes on to pellet cooler;
- (q) One (1) pellet cooler, labeled as part of EU# 26, constructed in 1996, replaced in 2005, with a maximum rate of 36,000 lbs raw material per hour (18 tph), using a high efficiency cyclone control device with a rating of 0.01 grains/dscf and 7,500 acfm at stack Pt#26;
- (r) One (1) totally enclosed drag conveyor, with a maximum rate of 18 tons per hour;
- (s) One (1) totally enclosed "L" path conveyor, with a maximum rate of 18 tons per hour; and
- (t) One (1) bucket leg, with a maximum rate of 18 tons per hour.

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

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

# D.6.1 PSD Minor Limit for PM and PM10 [326 IAC 2-2]

Pursuant to SSM145-21206-00035, as modified in T145-28055-00035, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM and PM10 emissions from the Pellet Mill and Cooler emission unit (Pt #26) shall not exceed the emissions limits listed in the table below:

Emission Unit	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
Pellet Mill and Cooler emission unit (Pt #26)	5.59	3.31

Compliance with these limits shall limit PM emissions from EU #26 to less than twenty-five (25) tons per twelve (12) consecutive month period and PM10 emissions to less than fifteen (15) tons per twelve (12) consecutive month period, and will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable to EU#26.

#### D.6.2 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the following units shall be limited as follows when operating at the listed process weight rate:

Emission Unit	Process Weight Rate (tons/hr)	PM Emission Limit (lb/hr)
Pellet Mill Operations (Pt #26)	18	28.4

These limitations were calculated using the following:

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

$$E = 4.10 P^{0.67}$$
 where  $E =$ rate of emission in pounds per hour and

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P = process weight rate in tons per hour

# Compliance Determination Requirements [326 IAC 2-7-5(1)]

#### D.6.3 Particulate Control [326 IAC 2-7-6(6)] [40 CFR Part 64]

In order to assure compliance with Conditions D.6.1 and D.6.2, the cyclone for particulate control shall be in operation and control emissions from the Pellet Mill and Cooler (Pt #26) at all times that the Pellet Mill and Cooler emission unit is in operation.

# D.6.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.6.1 and D.6.2, the Permittee shall perform PM and PM<sub>10</sub> testing on Pellet Mill and Cooler (Pt #26) utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM<sub>10</sub> contains filterable and condensable particulate matter.

# Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

# D.6.5 Visible Emissions Notations [40 CFR Part 64]

- (a) Once per day visible emission notations of the Pellet Mill and Cooler (Pt #26) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. 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.6.6 Cyclone Failure Detection [40 CFR Part 64]

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have 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). Failure to take response steps shall be considered a deviation from this permit.

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# Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

# D.6.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.6.5, the Permittee shall maintain records of visible emission notations of the Pellet Mill and Cooler (Pt #26) once per day. 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 pellet mill did not operate that day).
- (b) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

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# SECTION D.7 EMISSION UNIT OPERATION CONDITIONS

# **Emission Unit Description:**

# A-PLANT

- (u) One (1) screening bin, identified as #10a.
- (v) Three (3) totally enclosed conveyors to hull refining screener, identified as #25a.
- (w) One (1) totally enclosed dryer feed conveyor to the dryer feed elevator, identified as #29a.
- (x) Two (2) hull refining screeners, identified as #48a.
- (y) Four (4) hull refining aspirators, identified as #49a, exhausting to hull refining cyclone.
- (z) One (1) totally enclosed millfeed conveyor to storage, identified as #53a.
- (aa) One (1) millfeed elevator, identified as #54a, controlled by truck load out baghouse, and exhausting at stack Pt #12.
- (ab) One (1) seal screw conveyor, identified as #61a.
- (ac) The following emission units used in the one (1) totally enclosed sized meal conveyor, identified as #79a, aspirated to meal sizing system baghouse for control, and exhausting through stack Pt #24:
  - (1) One (1) enclosed meal screener feeder conveyor, identified as #74a, with a maximum throughput rate of 80 tons per hour, conveying the meal produced to the meal screen system.
  - One (1) enclosed meal grinder feed conveyor, identified as #75a, with a maximum throughput rate of 80 tons per hour, conveying the meal from the meal screen system to meal feeders.
  - One (1) meal grinding system, identified as #76, consisting of three (3) hammer mills, with a total maximum process rate of 80 tons per hour. This process rate is limited by the maximum throughput rate of the conveyors.
  - (4) Two (2) enclosed sized meal conveyors, identified as #78a, with a total maximum throughput rate of 80 tons per hour, conveying the ground meal from the meal grinding system (#76) to the meal handling system.
- (ad) Grain screening operations, with a maximum throughput rate of 724 ton/hr, consisting of the following units, using the screenings baghouse, and exhausting at stack Pt #5:
  - (1) One (1) screening surge bin;
  - (2) One (1) conveyor extending to the de-stoner;
  - (3) One (1) de-stoner, using a cyclone and the screening baghouse for control;
  - (4) One (1) screening grinder;
  - (5) Four (4) totally enclosed conveyors in a series, extending to the hull refining screener;

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(6	) One	(1)	viclona	exhausting	to the	ccrooning	haghouse.
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- (7) One (1) surge bin elevator;
- (8) One (1) whole bean surge bin;
- (9) One (1) dryer feed elevator;
- (10) One (1) totally enclosed dryer feed conveyor, transferring beans to the dryer feed elevator;
- (11) Two (2) whole bean aspirators, in parallel;
- (12) One (1) dryer discharge conveyor;
- (13) One (1) day bin elevator;
- (14) Two (2) day bins;
- (15) Two (2) totally enclosed conveyors, arranged in a series;
- (16) Two (2) conveyors extending from the dryer to the dryer discharge conveyor;
- (17) One (1) milling elevator;
- (18) One (1) product meal conveyor, identified as #1
- (19) One (1) meal surge conveyor, identified as #2;
- (20) Three (3) meal storage silos;
- (21) One (1) load out leg conveyor;
- (22) One (1) load out meal elevator;
- (23) One (1) meal transfer conveyor; and
- (24) One (1) screening transfer conveyor to screenings bucket elevator.

The emission units listed in (ad)(1) through (16) are affected facilities under NSPS Subpart DD.

#### **B-PLANT**

- (ae) One (1) totally enclosed millfeed conveyor to storage, identified as #2b.
- (af) One (1) millfeed elevator, identified as #3b, exhausting at stack Pt #12.
- (ag) One (1) aspirator between milling leg and bean scale, identified as #4b, aspirated to milling baghouse, and exhausting at stack Pt #4.
- (ah) One (1) totally enclosed hull collecting conveyor, identified as #5b, feeding the "B" plant hull refining screener.
- (ai) One (1) "B" plant whole bean surge bin #2, identified as #6b.

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(aj)	One (1) "B" plant hull grinder, identified as #7b, discharging to the screening baghouse,
	and exhausting at stack Pt #5.

- (ak) One (1) "B" plant whole soybean feed bucket elevator, identified as #8b, controlled by the screening baghouse, and exhausting at stack Pt #5.
- (al) One (1) "B" plant totally enclosed bean heater discharge conveyor, identified as #9b.
- (am) One (1) "B" plant whole bean aspiration, identified as #10b, controlled by the screening baghouse, and exhausting at stack Pt #4.
- (an) One (1) "B" plant bean weighing system, identified as #11b, controlled by the screening baghouse, and exhausting at stack Pt #4.
- (ao) One (1)"B" plant totally enclosed millfeed grinding conveyor, identified as #12b, controlled by the screening baghouse, and exhausting at stack Pt #5.
- (ap) Two (2) "B" plant hull refining screeners, identified as #13b, controlled by the screening baghouse, and exhausting at stack Pt #5.
- (aq) Two (2) "B" plant aspirators, identified as #14b, controlled by a hull refining cyclone, and exhausting at stack Pt #18.
- (ar) One (1) "B" plant totally enclosed feed conveyor, identified as #15b.
- (as) One (1) "B" plant bean heater, identified as #16b, with a maximum throughput rate of 128 ton/hr, controlled by a bean heater cyclone, and exhausting at stack Pt #25.
- (at) One (1) totally enclosed "B" plant soybean conveyor (feeding the jet dryers), identified as #17b, with a maximum throughput rate of 128 ton/hr, controlled by West Jet Dryer Baghouse, and exhausting at stack Pt # 18.
- (au) Two (2) jet dryers, identified as East Jet Dryer and West Jet Dryer (identified collectively as #18b), controlled by East Jet Dryer Baghouse and West Jet Dryer Baghouse, respectively, and exhausting at stack Pt # 18.
- (av) One (1) "B" plant bean heaters cyclone, identified as #19b, exhausting at stack Pt # 18A.
- (aw) One (1) "B" plant bean dryers cyclone, identified as #20b, exhausting at stack Pt # 18A.
- (ax) Two (2) "B" plant hulloosenators, identified as #21b.
- (ay) One (1) set of "B" plant cascade dryers, identified collectively as #22b, controlled by CCD cyclone, and exhausted at stack Pt #18.
- (az) One (1) set of "B" plant cracking rolls, identified as #23b.
- (ba) One (1) set of "B" plant cascade coolers, identified collectively as #24b, controlled by CCD cyclone, and exhausting at stack Pt # 18.
- (bb) Two (2) "B" plant totally enclosed after cascade coolers conveyors (feeding the flakers), identified as #25b, controlled by a soybean flaking baghouse, and exhausting at stack Pt #19.
- (bc) One (1) "B" plant cyclone, identified as #26b, exhausting at stack Pt # 18A.

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- (bd) Oil extraction and processing operations, servicing Plant B, consisting of the following units:
  - (1) One (1) set of "B" plant flakers, identified as #27b, with a maximum throughput rate of 128 ton/hr, controlled by a flakers baghouse, and exhausting at stack Pt # 19.
  - (2) One (1) "B" plant flakers baghouse, identified as #28b, exhausting at stack Pt # 19.
  - (3) Two (2) "B" plant totally enclosed flake conveyors (feeding the seal conveyor), identified as #29b.
  - (4) One (1) "B" plant totally enclosed seal screw conveyor (feeding the slurry loader conveyor), identified as #30b.
  - (5) One (1) "B" plant totally enclosed slurry loader conveyor (feeding the extractor), identified as #31b.
  - (6) One (1) "B" plant soybean oil extractor, identified as #32b, controlled by one (1) mineral oil absorption system, and exhausted at stack Pt # 23.
  - (7) A set of "B" plant evaporators, identified as #33b, controlled by two (2) mineral oil absorption systems, and exhausted at stack Pt # 23.
  - (8) A set of "B" plant condensers, hexane handling system and water separator to separate hexane and water, identified as #34b, controlled by one (1) mineral oil absorption system, and exhausted at stack Pt # 23.
  - (9) One (1) "B" plant mineral oil absorption system with a mineral oil to control hexane emissions, identified as #35b, and exhausted at stack Pt # 23.
  - (10) One (1) totally enclosed "B" plant spent flake conveyor, identified as #36b.

Under 40 CFR 63, Subpart GGGG, the oil extraction and processing operation is considered as part of an existing affected source.

- (be) Two (2) "B" plant meal dryers (#1 & #2), identified as #37b, with a combined maximum throughput rate of 46 ton/hr, controlled by one (1) dryer cyclone, and exhausting at stack Pt # 21.
- (bf) One (1) "B" plant meal cooler (#3), identified as #38b, with a maximum throughput rate of 46 ton/hr, controlled by one (1) cooler cyclone, and exhausting at stack Pt # 22.
- (bg) Four (4) "B" plant totally enclosed unground meal conveyors in series (meal screening system), with a maximum throughput rate of 80 ton/hr, identified as #39b.
- (bh) One (1) meal sizing baghouse, identified as #40b, exhausting at stack Pt #24.
- (bi) One (1) boiler, identified as Boiler No. 2, constructed in 2003, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 240 million Btu per hour, controlled by low NOx burners and flue gas recirculation, equipped with a continuous emission monitoring system (CEMS) for NOx, and exhausting at stack Pt # 20.

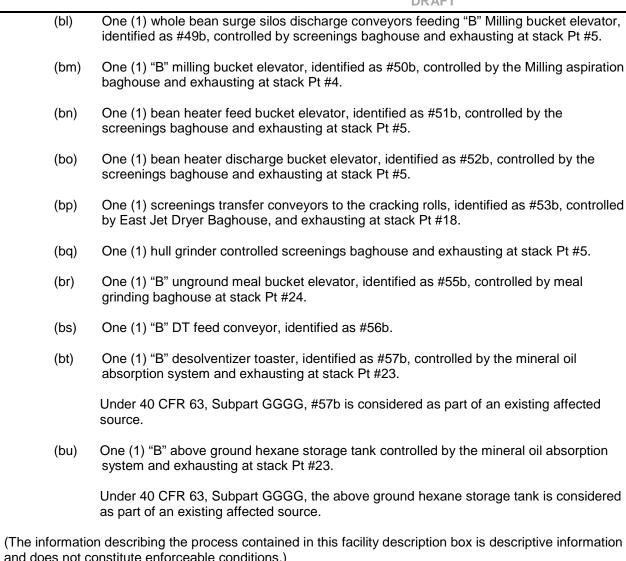
Under 40 CFR 60, Subpart Db, Boiler No. 2 is an affected facility.

Under 40 CFR 63, Subpart DDDDD, Boiler No. 2 is an affected source;

- (bj) One (1) screening leg, identified as #41b, transferring screenings from the screenings transfer conveyors to the screening surge bin.
- (bk) One (1) totally enclosed dryer feed conveyor, identified as #43b, transferring beans to the dryer feed elevator, controlled by screening baghouse, and exhausting at stack Pt #5.

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and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.7.1 PSD Minor Limit [326 IAC 2-2]

Pursuant to SSM145-9618-00035, as modified in T145-36069-00035, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable:

- the soybeans processed by the "B" plant, on an "as received" basis, shall be limited to (a) 1,073,159 tons per twelve (12) consecutive months (equivalent to an oil extraction process throughput of 1,065,538 tons per 12-month period), rolled on a monthly basis. This soybean limitation is required to limit the potential to emit of PM and PM10 to 225 and 218 tons per 12 consecutive months, rolled on a monthly basis, respectively.
- (b) the Permittee shall comply with the following PM and PM10 emissions:

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		DIVALL	
Process	Baghouse/ Cyclone; Stack	PM Limit (lb/hr)	PM-10 Limit (lb/hr)
Screening Baghouse	Baghouse; Pt #5	1.52	1.52
Truck unloading #1 and #2 fugitives	No control	7.29	2.39
Rail unloading fugitives	No control	0.64	0.156
B Bean Heater	Cyclone; Pt #25	0.62	3.43
Hot cracking and dehulling system, B-plant	(3) Cyclones; Pt #18, (2) Baghouses; Pt #18	25.8	25.8
Soybean Flaking, B-Plant	Baghouse; Pt #19	0.69	0.96
DTDC meal dryers #1 and #2, B-Plant	Cyclone; Pt #21	4.56	7.07
DTDC meal coolers #1 and #2, B-Plant	Cyclone; Pt #22	12.82	12.82
Meal sizing system	Baghouse; Pt #24	1.29	1.44
Boiler No. 2 (see (c), (d) and (e) below)	Stack Pt #20	10.5 tpy	10.5 tpy

- (c) The amount of distillate oil with 0.5% sulfur maximum, combusted in the Boiler No. 2 shall be limited to 6,343,949 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. These distillate oil limitations are required to limit SO<sub>2</sub> emissions to 249 tons per twelve (12) consecutive month period.
- (d) The amount of vegetable oil combusted in Boiler No. 2 shall not exceed 4,540,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. When using blends of vegetable oil and distillate fuel oil, only the volume of fuel which is vegetable oil shall count toward the usage limit.
- (e) When burning vegetable oil, or blends of vegetable oil and distillate fuel oil,  $PM_{10}$  emissions shall not exceed 0.016 pounds per million Btu heat input. This limit in combination with the vegetable oil usage limit in D.7.1(d) is required to restrict the emissions of  $PM_{10}$  from Boiler No. 2 to less than 10.5 tons per twelve (12) consecutive month period.

Compliance with these limits shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to PM,  $PM_{10}$  and  $SO_2$  emissions for SSM No. 145-9618-00035.

#### D.7.2 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the following units shall be limited as follows when operating at the listed process weight rate:

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Emission Unit	Process Weight Rate (tons/hr)	PM Emission Limit (lb/hr)
Grain screening operations (Pt #5)	724	73.5
Bean Heater (Pt #25)	128	53.8
B Hot Cracking and Dehulling (Pt #18)	128	53.8
B Flaking (Pt #19)	128	53.8
B Meal Dryer (Pt #21)	46	43.8
B Meal Cooler (Pt # 22)	46	43.8
Meal Grinding Pt #24)	80	49.1

These limitations were calculated using the following:

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

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

#### D.7.3 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the 240 MMBtu/hr boiler, identified as Boiler No. 2, shall not exceed 0.24 pound per million Btu heat input (lb/MMBtu).

#### D.7.4 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT Requirements):

(a) the Permittee shall control volatile organic compound (VOC) emissions from the combined "A" and "B" soybean oil extraction processes as follows:

Facility	Control	Emission Limit
Oil extractor "B" plant	Mineral oil absorber system	0.069 lb VOC/ton soybean
Meal dryers "B" plant	None	0.152 lb VOC/ton soybean
Meal coolers "B" plant	None	0.152 lb VOC/ton soybean
Combined "A" and "B" plants	First Year	0.20 gal VOC/ton soybean processed
	After first year	0.19 gal VOC/ton soybean processed
Maximum annual soybean processed by combined "A" and "B" plants, as received	(n/a)	1,901,996 tons per year

(b) BACT for fugitive hexane loss will include an annual leak check in accordance with Bunge's standard operating procedures accompanied by continuous monitoring of the process area by flammable gas monitors. The leak check will be completed on the affected system after hexane is reintroduced into the system.

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For emergency repairs and/or maintenance completed between annual maintenance shutdowns, a leak check will be completed on the affected.

(1) The Permittee shall immediately tag all detected leaks with a weatherproof and readily visible identification tag with a distinct number. Once a leaking component is detected, first-attempt repairs must be done within five days and be completed within 15 days of detecting the leaking components. If the repair cannot be accomplished within 15 days, then the Permittee shall send a notice of inability to repair to the OAQ within 20 days of detecting the leak. The notice must be received by:

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

within 20 days after the leak was detected. At a minimum the notice shall include the following:

- (A) Equipment, operator, and instrument identification number, and date of leak detection
- Measured concentration (ppm) and background (ppm) (B)
- (C) Leak identification number associated with the corresponding tag
- (D) Reason of inability to repair within 5 to 15 days of detection

#### Compliance Determination Requirements [326 IAC 2-7-5(1)]

#### Testing Requirements [326 IAC 2-7-6(1), (6)][326 IAC 2-1.1-11][326 IAC 2-2][326 IAC 3]

In order to demonstrate compliance with Conditions D.7.1(b) and D.7.4(a), the Permittee shall perform testing on the following sources utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM<sub>10</sub> contains filterable and condensable particulate matter.

Emission Unit (Emission Point)	Test Po	ollutants
Bean Heater, B-Plant (Pt # 25)	PM	PM-10
Hot cracking and dehulling system, B-plant (Pt # 18)	PM	PM-10
Soybean flaking, B-plant (Pt # 19)	PM	PM-10
Mineral oil absorption system (Pt # 23)	VOC	
Meal sizing system (Pt # 24)	PM	PM-10

#### D.7.6 Particulate Control [326 IAC 2-7-6(6)]

In order to assure compliance with Conditions D.7.1 (a) and (b), the baghouses and (a) cyclones shall be in operation at all times that the processes are in operation.

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In the event that bag failure is observed in a multi-compartment baghouse, if operations (b) 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.

#### Volatile Organic Compounds (VOC) [40 CFR Part 64] D.7.7

In order to assure compliance with Condition D.7.5, the absorber shall be operated at all times the oil extractor process is in operation at an average mineral oil flow rate established during the latest VOC (hexane) test.

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

#### Visible Emissions Notations [40 CFR Part 64] D.7.8

- Visible emission notations of the screening baghouse (Pt #5), B-Plant hot cracking and dehulling system (Pt #18), B-Plant Soybean flaking (Pt #19), B-Plant meal dryers (Pt #21) and meal sizing system (Pt #24) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- For processes operated continuously, "normal" means those conditions prevailing, or (b) 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.
- If abnormal emissions are observed, the Permittee shall take a reasonable response. (e) 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.7.9 Visible Emissions Notations

- Visible emission notations of the Boiler No.2 (Pt #20), B-Plant meal coolers (Pt #22), and (a) B-Plant (Pt #25) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- For processes operated continuously, "normal" means those conditions prevailing, or (b) expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- In the case of batch or discontinuous operations, readings shall be taken during that part (c) 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.
- If abnormal emissions are observed, the Permittee shall take a reasonable response. (e) Section C - Response to Excursions or Exceedances contains the Permittee's obligation

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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.7.10 Parametric Monitoring [40 CFR Part 64]

- Alarms shall be operational on all cyclone high level indicators. If an alarm sounds, the (a) Permittee shall take a reasonable 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.
- (b) The Permittee shall record the pressure drop across the bag houses used in conjunction with the associated processes, at least once per day when the screening baghouse (Pt #5), B-Plant hot cracking and dehulling system (Pt #18), B-Plant Soybean flaking (Pt #19), B-Plant meal dryers (Pt #21), and meal sizing system (Pt #24) are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for these units is a pressure drop between 0.5 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response 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.

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.

#### D.7.11 Parametric Monitoring

- Alarms shall be operational on all cyclone high level indicators. If an alarm sounds, the Permittee shall take a reasonable 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.
- (b) The Permittee shall record the pressure drop across the bag houses used in conjunction with the associated processes, at least once per day when the Boiler No.2 (Pt #20), B-Plant meal coolers (Pt #22), and B-Plant (Pt #25) are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for these units is a pressure drop between 0.5 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response 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.

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.

#### D.7.12 Broken or Failed Bag Detection

For a single compartment baghouse controlling emissions from a process operated (a) 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

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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 indicted by a significant drop in the baghouses 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.

#### D.7.13 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have 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). Failure to take a reasonable response shall be considered a deviation from this permit.

### D.7.14 VOC Monitoring [40 CFR Part 64]

In order to assure compliance with Condition D.7.4, the following monitoring requirements apply:

- (a) The Permittee shall monitor and record the mineral oil flow rate at least once per day when the mineral oil absorbers are in operation. When the mineral oil flow rate reading is below the minimum mineral oil flow rate for any one reading the Permittee shall take a reasonable response. The minimum mineral oil flow rate to the mineral oil absorber will be as recommended by the manufacturer or the minimum flow rate established during the latest stack test. The Preventive Maintenance Plan for the absorber shall contain troubleshooting contingency and corrective actions for when the flow rate readings are outside of the normal range for any one reading. Section C Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. A flow rate that is below the above mentioned rate is not a deviation from this permit. Failure to take a reasonable response shall be considered a deviation from this permit.
- (b) The instruments used for determining the flow rate shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every eighteen (18) months.
- (c) The gauge employed to take the mineral oil flow across the scrubber shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within + 10% of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.
- (d) In the event that the absorber's failure has been observed, an inspection will be conducted. Based upon the findings of the inspection, any corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.
- (e) The mineral oil to the mineral-oil-stripping column shall be kept at a minimum temperature of 180 °F for adequate stripping of the absorbed hexane from the oil. When the process is in operation, an electronic data management system (EDMS) shall record

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the instantaneous temperature on a frequency of not less than every two hours. As an alternative to installing an EDMS, manual readings shall be taken every two hours.

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

#### D.7.15 Record Keeping Requirements

Pursuant to 326 IAC 2-1-3(i) and 326 IAC 2-2:

- To document the compliance status with Condition D.7.1 (a), the Permittee shall maintain (a) records of the soybean processed by B-Plant.
- (b) To document the compliance status with Condition D.7.1 (c), the Permittee shall maintain records of the sulfur content in fuel oil #2 burned in Boiler No. 2 and the total amount of #2 fuel oil combusted.
- (c) To document the compliance status with Condition D.7.1 (d), the Permittee shall maintain records of the total amount of vegetable oil combusted in Boiler No. 2.
- (d) To document the compliance status with Condition D.7.4, the Permittee shall maintain records from combined plants "A" and "B" of the following:
  - (1) The amount of VOC (hexane) used per calendar month by the combined plants "A" and "B";
  - (2) The amounts of soybean processed by the combined plants "A" and "B"; and
  - (3)The gallons of hexane used per ton of soybean processed by the combined plants "A" and "B"
- To document the compliance status with Condition D.7.4, the Permittee shall maintain (e) records of the following:
  - (1) Equipment inspected;
  - (2)Date of inspection; and
  - Determination of whether a leak was detected. (3)

If a leak is detected, the Permittee shall record the following information.

- (A) The equipment, operator, and instrument identification number;
- (B) Measured concentration;
- (C) Leak identification number associated with the corresponding tag;
- (D) Date of repair;
- (E) Reason for non-repair if unable to repair within 5 to 15 days of detection;
- (F) Maintenance recheck if repaired-date, concentration, background, and
- (G) Any appropriate comments.
- (f) To document the compliance status with Conditions D.7.8 and 7.9, the Permittee shall maintain records of visible emission notations of the milling operations (Pt #4), screening

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baghouse (Pt #5), truck meal loadout operations (Pt #12), B-Plant hot cracking and dehulling system (Pt #18), B-Plant Soybean flaking (Pt #19), Boiler No.2 (Pt #20), B-Plant meal dryers (Pt #21), B-Plant meal coolers (Pt #22), meal sizing system (Pt #24), and B-Plant Bean heater (Pt #25) once per day. 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 mill operations, screening, truck meal loadout, hot cracking and dehulling system, soybean flaking, boiler, meal dryer, meal cooler, meal sizing system or bean heater did not operate that day).

- To document the compliance status with Conditions D.7.10 and D.7.11, the Permittee (g) shall maintain records of the pressure drops across the baghouses. The Permittee shall also maintain records of any alarms that sound and response steps taken.
- (h) To document the compliance status with Condition D.7.13, the Permittee shall maintain records of the events of the cyclone failure detection and the dates the failed units were repaired or replaced.
- (i) To document the compliance status with Condition D.7.14, the Permittee shall maintain records of the followings:
  - (1) The daily record of the mineral oil flow rate of the absorber;
  - (2) The events of the absorber's failure, findings of the inspections subsequent to absorber's failure, the corrective actions taken, and the time table for completion;
  - (3)The operating temperatures of the mineral oil absorber; and
  - (4) The temperature of the mineral oil stripping column.
- (j) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

#### D.7.16 Reporting Requirements

- A quarterly summary of the information to document the compliance status with Conditions D.7.1 (a) and (c) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) Pursuant to 326 IAC 7-2-1(c), the applicant shall submit reports of calendar month for annual average sulfur content or sulfur dioxide rate in pounds per million Btu, heat content, fuel consumption upon request to the Office of Air Quality.

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### SECTION D.8 EMISSION UNIT OPERATION CONDITIONS

#### **Emission Unit Description:**

#### **Insignificant Activities:**

- (a) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (c) Emission units with PM and PM10 emissions less than five (5) tons per year, SO<sub>2</sub>, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
  - (1) One (1) #2 fuel oil storage tank, identified as #4, with a capacity of 3,958 cubic feet;
  - (2) One (1) soybean oil storage tank, identified as #6, with a capacity of 38,000 cubic feet;
  - (3) One (1) soybean oil storage tank, identified as #7, with a capacity of 38,000 cubic feet; and
  - (4) One (1) #2 fuel oil storage tank, identified as #10, with a capacity of 3,958 cubic feet.

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

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.8.1 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate 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 shall not exceed 0.551 pounds per hour. The following insignificant activities are subject to this rule: blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower; and replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

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### SECTION D.9 EMISSION UNIT OPERATION CONDITIONS

#### **Emission Unit Description:**

Insignificant Activities:

(g) One (1) Graymills scrub station (parts washer), constructed in 2000, with a maximum annual solvent usage of 40 gallons per year.

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

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.9.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]
  Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:
  - (a) Ensure the following control equipment and operating requirements are met:
    - (1) Equip the degreaser with a cover.
    - (2) Equip the degreaser with a device for draining cleaned parts.
    - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
    - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
    - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
    - (6) Store waste solvent only in closed containers.
    - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
  - (b) Ensure the following additional control equipment and operating requirements are met:
    - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
      - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
      - (B) A water cover when solvent used is insoluble in, and heavier than, water.
      - (C) A refrigerated chiller.
      - (D) Carbon adsorption.
      - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
    - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

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(3) If used, solvent spray:

- (A) must be a solid, fluid stream; and
- (B) shall be applied at a pressure that does not cause excessive splashing.

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#### D.9.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

#### D.9.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

#### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.9.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.9.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
  - (3) The type of solvent purchased.
  - (4) The total volume of the solvent purchased.
  - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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#### SECTION E.1 CONSENT DECREE

#### **Emission Unit Description:**

- (a) The vegetable oil production processes as defined in 40 CFR 63.2872.
- (b) One (1) boiler, identified as the Murray boiler (aka Boiler No. 1), constructed in 1996, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 96 million Btu per hour, exhausting to Murray Stack (aka Stack Pt #14).
  - Under 40 CFR 60, Subpart Dc, Murray boiler is an affected facility.
  - Under 40 CFR 63, Subpart DDDDD, Murray boiler is an affected source.
- (c) One (1) boiler, identified as Boiler No. 2, constructed in 2003, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 240 million Btu per hour, controlled by low NOx burners and flue gas recirculation, equipped with a continuous emission monitoring system (CEMS) for NOx, and exhausting at stack Pt # 20.
  - Under 40 CFR 60, Subpart Db, Boiler No. 2 is an affected facility.
  - Under 40 CFR 63, Subpart DDDDD, Boiler No. 2 is an affected source.

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

#### **Consent Decree**

#### E.1.1 VOC SLR Consent Decree Limits, Compliance, and Record Keeping Requirements

- (a) As used in this section, "Consent Decree" shall mean the consent decree entered on January 16, 2007, in Civil Action No. 2:06-CV-02209, United States District Court for the Central District of Illinois, in which the Permittee and IDEM were parties.
- (b) The provisions of this subsection are designed to ensure compliance with the final volatile organic compound solvent loss ratio requirements of the Consent Decree entered into between the Permittee and IDEM on October 26, 2006. Nothing in this subsection is intended to expand, restrict or otherwise alter the obligations imposed on the Permittee by the Consent Decree.
- (c) The VOC solvent loss ratio (SLR) for this facility shall not exceed 0.16 gallons of solvent lost per ton of oilseed processed for conventional soybean processing at this existing source. To determine compliance with the VOC SLR limit, the Permittee shall maintain a Compliance Ratio of less than or equal to 1.0, which shall be calculated as follows:

Compliance Ratio = Actual Solvent Loss (gal) / Allowable Solvent Loss (gal)

Where:

Actual Solvent Loss (gal) = Gallons of solvent loss during previous 12 operating months

Allowable Solvent Loss (gal) = Oilseed (tons) \* VOC Solvent Loss Ratio Limit (gal/ton)

Oilseed (tons) = Tons of each oilseed processed during the previous 12 operating months

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VOC Solvent Loss Ratio (SLR) Limit = 0.16 gallons per ton of oilseed

- (d) Solvent losses and quantities of oilseed processed during startup and shutdown periods shall not be excluded in determining solvent losses.
- (e) For purposes of calculating SLR, the Permittee may apply the provisions of 40 CFR Part 63, Subpart GGGG, pertaining to malfunction periods when both of the following conditions are met:
  - (1) The malfunction results in a total plant shutdown, which means a shutdown of the solvent extraction system; and
  - (2) The total amount of solvent loss to which the provisions of 40 CFR Part 63, Subpart GGGG relating to malfunctions is applied in a rolling 12-month period does not exceed the Allowable Malfunction Volume as determined below. The Allowable Malfunction Volume in gallons is equal to the facility's 12-month Crush capacity times its final VOC SLR limit (0.16 gal/ton) times 0.024, as follows:

Allowable Malfunction Volume (gal) = 12-month Crush capacity (tons) \* Final VOC SLR limit (0.16 gal/ton) \* 0.024

Where:

12-month Crush capacity (tons) = the 12-month design capacity of the plant (tons)

Except as otherwise set forth herein, the Permittee shall include all solvent losses when determining compliance with the VOC SLR limit. The total solvent loss corresponding to a malfunction period shall be calculated as the difference in the solvent inventory, as defined in 40 CFR 63.2862(c)(1), for the day before the malfunction period began and the solvent inventory on the day the plant resumes normal operation. During a malfunction period, the facility shall comply with the Startup, Shutdown, Malfunction (SSM) Plan as required under Subpart GGGG.

- (f) To document the compliance status with the Consent Decree, the Permittee shall:
  - (1) Conduct daily monitoring and recordkeeping of solvent losses.
  - (2) Maintain a Solvent Loss Records Table including (A) through (F) below. Records maintained for (A) through (D) below shall be documented on a monthly and on a 12-month rolling basis and shall be complete and sufficient to establish compliance with the VOC SLR limit established in paragraph (c) above. Records maintained for (E) and (F) shall be determined monthly. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period and shall be maintained for a period of five (5) years from the date of generation.
    - (A) The amount of oilseed processed (tons).
    - (B) The total solvent loss (gal).
    - (C) The solvent loss during malfunction periods (gal).
    - (D) The adjusted solvent loss (gal), where:

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Adjusted solvent loss (gal) = total solvent loss (gal) - solvent loss during malfunction periods (gal).

(E) The actual solvent loss ratio (gal/ton), where:

Actual solvent loss ratio (gal/ton) = 12-month rolling adjusted solvent loss (gal) / 12-month rolling amount of oilseed processed (ton)).

(F) Compliance Ratio, as determined in paragraph (c) above.

#### E.1.2 NOx Combustion Consent Decree Limits, Compliance, and Record Keeping Requirements

- (a) Pursuant the Consent Decree entered on January 16, 2007, in Civil Action No. 2:06-CV-02209, the NOx emissions from Boiler No. 2 shall not exceed 0.05 lb/MMBtu.
- (b) The Permittee shall install, calibrate, certify, maintain, evaluate, and operate a NOx continuous emissions monitoring system (CEMS) on Boiler No. 2. All monitoring data shall be collected and recorded and maintained onsite in accordance with the requirements of 40 CFR Part 60, 326 IAC 3-5-2, and 326 IAC 3-5-3.
- (c) The Permittee shall comply with the applicable provisions of 326 IAC 3-5-4 and 326 IAC 3-5-5.
- (d) In order to document the compliance status with (a) and (b) above, the Permittee shall record the output of the continuous monitoring system and shall perform the required record keeping pursuant to 326 IAC 3-5-6.
- (e) The Permittee shall perform the required reporting requirements pursuant to 326 IAC 3-5-7,
- (f) A semi-annual summary of the information to document the compliance status with (a) above shall be submitted not later than thirty (30) days after the semi-annual period being reported. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

#### E.1.3 SO2 Combustion Consent Decree Limits, Compliance, and Record Keeping Requirements

- (a) Pursuant the Consent Decree entered on January 16, 2007, in Civil Action No. 2:06-CV-02209, the sulfur content of the fuel oil combusted in Murray Boiler (Boiler No. 1) and Boiler No.2 shall not exceed 0.05% by weight.
- (b) Compliance with the sulfur content limit established in (a) shall be determined utilizing one of the following options.
  - (1) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur content of the fuel oil does not exceed 0.05% by weight, by:
    - (A) Providing vendor analysis of the sulfur content of the fuel delivered, if accompanied by a vendor certification; or
    - (B) Analyzing the fuel sample to determine the sulfur content of the fuel via the procedures in 40 CFR 60, Appendix A, Method 19.
      - (i) Fuel samples may be collected from the fuel tank immediately after the fuel tank is filled and before any fuel is combusted; and

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- (ii) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (2) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 96 MMBtu and/or 240 MMBtu per hour boilers, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.
- (c) To document the compliance status with (a) and (b) above, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (5) below shall be taken monthly and shall be complete and sufficient to establish compliance with the limits established (a) and (b) above.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fuel usage and sulfur content for No. 2 fuel oil used at the source since the last compliance determination period;
  - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and
  - (4) If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:
    - (i) Fuel supplier certifications;
    - (ii) The name of the fuel supplier; and
    - (iii) A statement from the fuel supplier that certifies the sulfur content of the No. 2 fuel oil.

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SECTION F.1 NSPS

#### **Emission Unit Description:**

- (a) Truck receiving operations, constructed in 1996, consisting of the following units, using the truck receiving/storage baghouse for control, and exhausting at stack Pt #1:
  - (1) Two (2) truck dumps (#1 & #2);
  - (2) Two (2) truck receiving conveyors (#1 & #2);
  - (3) Two (2) receiving legs (#1 & #2), using the truck receiving/storage baghouse and oil applications;
  - (4) One (1) screen;
  - (5) Two (2) receiving legs (#1 & #2) extending from the screen;
  - (6) Two (2) screening conveyors;
  - (7) One (1) screening leg;
  - (8) One (1) screening leg;
  - (9) Two (2) conveyors (#1 & #2) extending to storage silos and to bulk storage;
  - (10) Two (2) conveyors extending to bulk storage feeding and continuing to the bulk storage silos;
  - (11) Ten (10) silos;
  - (12) One (1) screening bin;
  - (13) Two (2) bulk storage bins;
  - (14) One (1) screening conveyor extending from the screening silo;
  - (15) One (1) screening storage conveyor;
  - (16) Two (2) totally enclosed screenings transfer conveyors arranged in a series, transferring screenings from the screenings storage conveyors to the screening bucket elevator;
  - One (1) screening bucket elevator, transferring screenings from the screenings transfer conveyors to the screenings surge bin;
  - (18) Two (2) bulk storage return conveyors (#1 & #2) arranged in a series;
  - (19) Two (2) conveyors from storage (#1 & #2);
  - (20) One (1) conveyor extending to the surge bin leg;
  - One (1) truck receiving/storage baghouse conveyor which transfers dust from the baghouse back to the screening leg;
  - (22) Two (2) screens, identified as #4, with a total maximum throughput rate of 1,210

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tons per hour;

- (23) One (1) transfer system, identified as #9a, with a maximum throughput rate of 1,150 tons per hour, transferring soybeans from the bulk storage elevator to the bulk storage silos;
- One (1) enclosed whole bean conveyor, identified as #16a, with a maximum throughput rate of 340 tons per hour, conveying beans from the surge bin leg to the whole bean surge silo (#28a);
- One (1) whole bean surge silo, identified as #28a, with a maximum storage capacity of 40,000 bushels;
- One (1) enclosed conveyor, identified as #17a, with a maximum throughput rate of 40 tons per hour, conveying the dust from the truck receiving/storage baghouse to the screening leg;
- (27) One (1) new bean screening screw conveyor, identified as #1a, with a maximum throughput rate of 36 tons per hour, transferring soybeans from the screening system (#4) to the screening leg baghouse;
- (28) Two (2) screening legs, identified as #7a;
- (29) Two (2) transfer conveyors aspirated to truck receiving/storage baghouse, identified as #13a; and

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(30) Four (4) aspirators between conveyor from storage, identified as #16, and surge bin leg, identified as #27, aspirated to truck receiving/storage baghouse.

Under 40 CFR 60, Subpart DD, these truck receiving operations are affected facilities.

- (b) Rail receiving operations, constructed in 1996, consisting of the following units, using the rail receiving baghouse for control, and exhausting at stack Pt #1:
  - (1) One (1) rail car dump; and
  - (2) One (1) rail car receiving conveyor;

Under 40 CFR 60, Subpart DD these rail receiving operations are affected facilities.

- (ad) Grain screening operations, with a maximum throughput rate of 724 ton/hr, consisting of the following units, using the screenings baghouse, and exhausting at stack Pt #5:
  - (1) One (1) screening surge bin;
  - (2) One (1) conveyor extending to the de-stoner;
  - (3) One (1) de-stoner, using a cyclone and the screening baghouse for control;
  - (4) One (1) screening grinder;
  - (5) Four (4) totally enclosed conveyors in a series, extending to the hull refining screener;

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- (6) One (1) cyclone exhausting to the screening baghouse;
- (7) One (1) surge bin elevator;
- (8) One (1) whole bean surge bin;
- (9) One (1) dryer feed elevator;
- (10) One (1) totally enclosed dryer feed conveyor, transferring beans to the dryer feed elevator;
- (11) Two (2) whole bean aspirators, in parallel;
- (12) One (1) dryer discharge conveyor;
- (13) One (1) day bin elevator;
- (14) Two (2) day bins;
- (15) Two (2) totally enclosed conveyors, arranged in a series;
- (16) Two (2) conveyors extending from the dryer to the dryer discharge conveyor;
- (17) One (1) milling elevator;
- (18) One (1) product meal conveyor, identified as #1
- (19) One (1) meal surge conveyor, identified as #2;
- (20) Three (3) meal storage silos;
- (21) One (1) load out leg conveyor;
- (22) One (1) load out meal elevator;
- (23) One (1) meal transfer conveyor; and
- (24) One (1) screening transfer conveyor to screenings bucket elevator.

The emission units listed in (ad)(1) through (16) are affected facilities under NSPS Subpart DD.

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

## New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

- F.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR 60, Subpart A]
  - (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission units listed above, except as otherwise specified in 40 CFR 60, Subpart DD.

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(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports 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

### F.1.2 Grain Elevators NSPS [326 IAC 12][40 CFR 60, Subpart DD]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart DD (included as Attachment A to this operating permit) which are incorporated by reference as 326 IAC 12, for the emission units listed above:

- (1) 40 CFR 60.300
- (2) 40 CFR 60.301
- (3) 40 CFR 60.302(b), (c)
- (4) 40 CFR 60.303
- (5) 40 CFR 60.304

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SECTION F.2 NSPS

#### **Emission Unit Description:**

(n) One (1) boiler, identified as the Murray boiler (aka Boiler No. 1), constructed in 1996, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 96 million Btu per hour, exhausting to Murray Stack (aka Stack Pt #14).

Under 40 CFR 60, NSPS Subpart Dc, Murray boiler is an affected facility.

Under 40 CFR 63, Subpart DDDDD, Murray boiler is an affected source;

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

#### New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

- F.2.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR 63, Subpart A]
  - (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission units listed above, except as otherwise specified in 40 CFR 60, Subpart Dc.
  - (b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports 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

- F.2.2 Small Industrial-Commercial-Institutional Steam Generating Units NSPS [326 IAC 12] [40 CFR 60.40c, Subpart Dc]
  - (a) The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart Dc (included as Attachment B to this operating permit), which are incorporated by reference as 326 IAC 12, for the emission units listed above:
    - (1) 40 CFR 60.40c
    - (2) 40 CFR 60.41c
    - (3) 40 CFR 60.42c(d), (e), (f), (g), (h)
    - (4) 40 CFR 60.43c(c),(d)
    - (5) 40 CFR 60.44c
    - (6) 40 CFR 60.45c
    - (7) 40 CFR 60.46c
    - (8) 40 CFR 60.47c
    - (9) 40 CFR 60.48c
  - (b) There are no requirements in 40 CFR 60 Subpart Dc specifically related to vegetable oil combustion. Pure vegetable oil does not conform to the definition of "oil" under 326 IAC 40 CFR 60.41c because it is not petroleum based. Therefore, the fuel oil limits apply only to burning distillate fuel oil or blends of vegetable oil and distillate fuel oil.

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#### SECTION F.3 NSPS

#### **Emission Unit Description:**

(bi) One (1) boiler, identified as Boiler No. 2, constructed in 2003, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 240 million Btu per hour, controlled by low NOx burners and flue gas recirculation, equipped with a continuous emission monitoring system (CEMS) for NOx, and exhausting at stack Pt # 20.

Under 40 CFR 60, Subpart Db, Boiler No. 2 is an affected facility.

Under 40 CFR 63, Subpart DDDDD, Boiler No. 2 is an affected source.

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

#### New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

- F.3.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR 60, Subpart A]
  - (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit listed above, except as otherwise specified in 40 CFR 60, Subpart Dc.
  - (b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports 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

- F.3.2 Industrial-Commercial-Institutional Steam Generating Units NSPS [326 IAC 12] [40 CFR 60.40b, Subpart Db]
  - (a) The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart Db (included as Attachment C to this operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit listed above:
    - (1) 40 CFR 60.40b
    - (2) 40 CFR 60.41b
    - (3) 40 CFR 60.42b(d), (e), (f), (g), (h), (j)
    - (4) 40 CFR 60.43b(b)
    - (5) 40 CFR 60.44b(a), (b), (l)
    - (6) 40 CFR 60.45b
    - (7) 40 CFR 60.46b
    - (8) 40 CFR 60.47b
    - (9) 40 CFR 60.48b
    - (10) 40 CFR 60.49b

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(b) There are no requirements in 40 CFR 60 Subpart Db specifically related to vegetable oil combustion. Pure vegetable oil does not conform to the definition of "oil" under 326 IAC 40 CFR 60.41b because it is not petroleum based. Therefore, the fuel oil limits apply only to burning distillate fuel oil or blends of vegetable oil and distillate fuel oil.

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#### SECTION F.4 NESHAP

#### **Emission Unit Description:**

- (i) Oil extraction and processing operations, constructed in 1996, with a maximum throughput rate of 46 ton/hr, servicing Plant A, consisting of the following units:
  - (1) One (1) soybean oil extractor, using a mineral oil absorber for control, and exhausting at stack Pt #9;
  - (2) One (1) set of evaporators, using a mineral oil absorber for control, and exhausting at stack Pt #9:
  - (3) One (1) desolventizer/toaster, using a mineral oil absorber for control, and exhausting at stack Pt #9;
  - One (1) set of condensers and water separators to separate hexane and water, using a mineral oil absorber for control, and exhausting at stack Pt #9;
  - (5) Two (2) mineral oil absorbers, using a mineral oil absorber for control, and exhausting at stack Pt #9;
  - (6) One (1) spent flake conveyor extending to the meal dryer;
  - (7) One (1) totally enclosed seal screw conveyor, installed in a series with the slurry loader conveyor;
  - (8) One (1) flake conveyor extending to the slurry loader conveyor;
  - (9) One (1) slurry loader conveyor;
  - (10) One (1) hexane storage tank, identified as #1 (storage);
  - (11) One (1) hexane storage tank, identified as #2 (process tank);
  - (12) One (1) hexane storage tank, identified as #3 (work/separation);

Under 40 CFR 63, Subpart GGGG, these oil extraction and processing operations are considered as part of an existing affected source.

- (bd) One (1) set of "B" plant flakers, identified as #27b, with a maximum throughput rate of 128 ton/hr, controlled by a flakers baghouse, and exhausting at stack Pt # 19.
  - Under 40 CFR 63, Subpart GGGG, #27b is considered as part of an existing affected source.
- (be) One (1) "B" plant flakers baghouse, identified as #28b, exhausting at stack Pt # 19.
- (bf) Two (2) "B" plant totally enclosed flake conveyors (feeding the seal conveyor), identified as #29b.
  - Under 40 CFR 63, Subpart GGGG, #29b is considered as part of an existing affected source.
- (bg) One (1) "B" plant totally enclosed seal screw conveyor (feeding the slurry loader conveyor), identified as #30b.

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Permit Reviewer: Curtis Taylor/Madhurima Moulik

- Under 40 CFR 63, Subpart GGGG, #30b is considered as part of an existing affected source.
- (bh) One (1) "B" plant totally enclosed slurry loader conveyor (feeding the extractor), identified as
  - Under 40 CFR 63, Subpart GGGG, #31b is considered as part of an existing affected source.
- (bi) One (1) "B" plant soybean oil extractor, identified as #32b, controlled by one (1) mineral oil absorption system, and exhausted at stack Pt # 23.
  - Under 40 CFR 63, Subpart GGGG, #32b is considered as part of an existing affected source.
- (bj) A set of "B" plant evaporators, identified as #33b, controlled by two (2) mineral oil absorption systems, and exhausted at stack Pt # 23.
  - Under 40 CFR 63, Subpart GGGG, #33b is considered as part of an existing affected source.
- (bk) A set of "B" plant condensers, hexane handling system and water separator to separate hexane and water, identified as #34b, controlled by one (1) mineral oil absorption system, and exhausted at stack Pt # 23.
  - Under 40 CFR 63, Subpart GGGG, #34b considered as part of an existing affected source.
- (bl) One (1) "B" plant mineral oil absorption system with a mineral oil to control hexane emissions, identified as #35b, and exhausted at stack Pt # 23.
  - Under 40 CFR 63, Subpart GGGG, #35b is considered as part of an existing affected source.
- (bm) One (1) totally enclosed "B" plant spent flake conveyor, identified as #36b.
  - Under 40 CFR 63, Subpart GGGG, #36b is considered as part of an existing affected source.
- (cc) One (1) "B" desolventizer toaster, identified as #57b, controlled by the mineral oil absorption system and exhausting at stack Pt #23.
  - Under 40 CFR 63, Subpart GGGG, #57b is considered as part of an existing affected source.
- (cd) One (1) "B" above ground hexane storage tank controlled by the mineral oil absorption system and exhausting at stack Pt #23.
  - Under 40 CFR 63, Subpart GGGG, the above ground hexane storage tank is considered as part of an existing affected source.

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

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# National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

- F.4.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR 63, Subpart A]
  - (a) Pursuant to 40 CFR 63.1, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR 63, Subpart GGGG.
  - (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

F.4.2 Solvent Extraction for Vegetable Oil Production NESHAP [40 CFR 63, Subpart GGGG] [326 IAC 20-60]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart GGGG (included as Attachment D to this operating permit), which are incorporated by reference as 326 IAC 20-60, for the emission units listed above:

- (1) 40 CFR 63.2830
- (2) 40 CFR 63.2831
- (3) 40 CFR 63.2832(a)
- (4) 40 CFR 63.2833
- (5) 40 CFR 63.2834(a)
- (6) 40 CFR 63.2840(a)-(d), (f)
- (7) 40 CFR 63.2850(a), (b), (d), (e)
- (8) 40 CFR 63.2851
- (9) 40 CFR 63.2852
- (10) 40 CFR 63.2853
- (11) 40 CFR 63.2854
- (12) 40 CFR 63.2855
- (13) 40 CFR 63.2860
- (14) 40 CFR 63.2861
- (15) 40 CFR 63.2862
- (16) 40 CFR 63.2863
- (17) 40 CFR 63.2870
- (18) 40 CFR 63.2871
- (19) 40 CFR 63.2872

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#### **SECTION F.5 NESHAP**

#### **Emission Unit Description:**

(n) One (1) boiler, identified as the Murray boiler (aka Boiler No. 1), constructed in 1996, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 96 million Btu per hour, exhausting to Murray Stack (aka Stack Pt#14).

Under 40 CFR 60 Subpart Dc, Murray boiler is an affected facility.

Under 40 CFR 63, Subpart DDDDD, Murry boiler is an affected source.

- (o) One (1) vegetable oil refinery process, constructed in 2002, with a maximum throughput rate of 60 ton/hr, consisting of crude vegetable oil receiving, storage, filtration, and degumming equipment; lecithin drying and processing equipment; oil refining, deodorizing, and filtration equipment; bulk oil handling, blending, storage, and loadout facilities; and including the following equipment:
  - One (1) natural gas-fired refinery boiler, identified as R-107, with a maximum heat (7)input rating of 13 MMBtu/hr, exhausting to Stack R-107.

Under 40 CFR 63, Subpart DDDDD, R-107 is an affected source.

(bi) One (1) boiler, identified as Boiler No. 2, constructed in 2003, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 240 million Btu per hour, controlled by low NOx burners and flue gas recirculation, equipped with a continuous emission monitoring system (CEMS) for NOx, and exhausting at stack Pt # 20.

Under 40 CFR 60, Subpart Db, Boiler No. 2 is an affected facility.

Under 40 CFR 63, Subpart DDDDD, Boiler No. 2 is an affected source.

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

#### National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

- F.5.1 General Provisions Relating to NESHAP DDDDD [326 IAC 20-1][40 CFR Part 63, Subpart A]
  - Pursuant to 40 CFR 63.1, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart DDDDD.
  - Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and (b) reports 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

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# F.5.2 Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP [326 IAC 20-95][40 CFR Part 63, Subpart DDDDD]

The Permittee shall comply with the following provisions of 40 CFR 63, Subpart DDDDD (included as Attachment E to this operating permit), which are incorporated by reference as 326 IAC 20-95, for the emission units listed above:

- (1) 40 CFR 63.7480
- (2) 40 CFR 63.7485
- (3) 40 CFR 63.7490
- (4) 40 CFR 63.7495(b) and (d)
- (5) 40 CFR 63.7499
- (6) 40 CFR 63.7500
- (7) 40 CFR 63.7501
- (8) 40 CFR 63.7505
- (9) 40 CFR 63.7510
- (10) 40 CFR 63.7515
- (11) 40 CFR 63.7520
- (12) 40 CFR 63.7521
- (12) 40 01 10 03.7321
- (13) 40 CFR 63.7522
- (14) 40 CFR 63.7525
- (15) 40 CFR 63.7530
- (16) 40 CFR 63.7535
- (17) 40 CFR 63.7540
- (18) 40 CFR 63.7541
- (19) 40 CFR 63.7545
- (20) 40 CFR 63.7550
- (21) 40 CFR 63.7555
- (22) 40 CFR 63.7560
- (23) 40 CFR 63.7565
- (24) 40 CFR 63.7570
- (25) 40 CFR 63.7575
- (26) Table 2 to 40 CFR 63
- (27) Table 3 to 40 CFR 63
- (28) Table 4 to 40 CFR 63 (29) Table 5 to 40 CFR 63
- (20) Table 0 to 40 OFR 00
- (30) Table 6 to 40 CFR 63 (31) Table 7 to 40 CFR 63
- (32) Table 8 to 40 CFR 63
- (33) Table 9 to 40 CFR 63
- (34) Table 10 to 40 CFR 63
- (35) Table 11 to 40 CFR 63

#### F.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11] [326 IAC 2-7-5(1)]

In order to demonstrate compliance with Condition F.5.2, the Permittee shall perform the stack testing required under 40 CFR 63, Subpart DDDDD, utilizing methods as approved by the Commissioner, at least once every five (5) years from the date of the most recent valid compliance demonstration. Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

Bunge North America (East), Inc.

Significant Permit Modification No. 145-36883-00035

Morristown, Indiana

Significant Permit Modification No. 145-36883-00035

Modified By: Madhurima Moulik

Permit Reviewer: Curtis Taylor/Madhurima Moulik

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#### SECTION F.6 NESHAP

**Emission Unit Description:** 

- (d) Emergency fire pumps as follows:
  - (1) One (1) diesel-fired emergency fire pump, constructed in January 1996, identified as Fire Pump #1, with a rating of 443 HP, using no control.

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- (2) One (1) diesel-fired emergency fire pump, constructed in December 1995, identified as Fire Pump #2, with a rating of 443 HP, using no control.
- One (1) diesel-fired emergency fire pump, constructed in September 2002, identified as Fire Pump #3, with a rating of 575 HP, using no control.
- (4) One (1) diesel-fired emergency fire pump, constructed in October 2002, identified as Fire Pump #4, with a rating of 575 HP, using no control.

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

# National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

- F.6.1 General Provisions Relating to NESHAP Subpart ZZZZ [326 IAC 20-1][40 CFR Part 63, Subpart Al
  - (a) Pursuant to 40 CFR 63.1, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.
  - (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

F.6.2 Stationary Reciprocating Internal Combustion Engines NESHAP [326 IAC 20-82][40 CFR Part 63, Subpart ZZZZ]

The Permittee shall comply with the following provisions of 40 CFR 63, Subpart ZZZZ (included as Attachment F to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emission units listed above:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585(a), (b)
- (3) 40 CFR 63.6590(a)(1)
- (4) 40 CFR 63.6595(a)(1), (c)
- (5) 40 CFR 63.6600(c) [Fire Pumps #3 and #4]
- (6) 40 CFR 63.6602 [Fire Pumps #1 and #2]
- (7) 40 CFR 63.6605
- (8) 40 CFR 63.6645(a)
- (9) 40 CFR 63.6645(b) [Fire Pumps #3 and #4]
- (10) 40 CFR 63.6645(d)[Fire Pumps #1 and #2]

Bunge North America (East), Inc. Significant Morristown, Indiana Permit Reviewer: Curtis Taylor/Madhurima Moulik Significant Permit Modification No. 145-36883-00035 Modified By: Madhurima Moulik Page 100 of 111 T145-36069-00035

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40 CFR 63.6665 (11)

- (12) 40 CFR 63.6670
- (13) 40 CFR 63.6675
- (14) Table 2c [Fire Pumps #1 and #2]

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

## **PART 70 OPERATING PERMIT CERTIFICATION**

Source Name: Bunge North America (East), Inc.

Source Address: 700 N. Range Line Road, Morristown, Indiana 46161

Part 70 Permit No.: T145-36069-00035

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:		
Phone:		
Date:		

Significant Permit Modification No. 145-36883-00035 Modified By: Madhurima Moulik

Permit Reviewer: Curtis Taylor/Madhurima Moulik

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## 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

-101310113, Indiana 46204 Phone: (317) 233-0178 Fax: (317) 233-6865

# PART 70 OPERATING PERMIT EMERGENCY OCCURRENCE REPORT

Source Name: Bunge North America (East), Inc.

Source Address: 700 N. Range Line Road, Morristown, Indiana 46161

Part 70 Permit No.: T145-36069-00035

### This form consists of 2 pages

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- ☐ 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 2-7-16.

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:	

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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
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>X</sub> , CO, Pb, other:	
Estimated amount of pollutant(s) emitted during emergency:	
Describe the steps taken to mitigate the problem:	
Describe the corrective actions/response steps taken:	
Describe the measures taken to minimize emissions:	
If applicable, describe the reasons why continued operation of the facilities imminent injury to persons, severe damage to equipment, substantial loss of product or raw materials of substantial economic value:	
Form Completed by:	
Title / Position:	
Date:	
Phone:	

Significant Permit Modification No. 145-36883-00035

Modified By: Madhurima Moulik Permit Reviewer: Curtis Taylor/Madhurima Moulik

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

## **PART 70 OPERATING PERMIT** SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Source Address: Part 70 Permit No.:	Bunge North America (East), Inc. 700 N. Range Line Road, Morristown, Indiana 46161 T145-36069-00035
MURRAY BOILER  □ Natural Gas Only □ Alternate Fuel burn From: To:	ed
BOILER NO. 2  □ Natural Gas Only □ Alternate Fuel burn From: To:_	ed
	information and belief formed after reasonable inquiry, the statements and ument are true, accurate, and complete.
Signature:	
Printed Name:	
Title/Position:	
Phone:	
Date:	

Significant Permit Modification No. 145-36883-00035 Modified By: Madhurima Moulik

Permit Reviewer: Curtis Taylor/Madhurima Moulik

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

#### Part 70 Quarterly Report

Source Name: Bunge North America (East), Inc.

Source Address: 700 N. Range Line Road, Morristown, Indiana 46161

Part 70 Permit No.: T145-36069-00035

Facility: Soybean Processing Facilities (A-Plant (Existing))

Parameter: Soybean throughput

Limit: Less than 828,837 tons of soybean per twelve (12) consecutive month period, on

an "as received" basis, with compliance determined at the end of each month

QL	JARTER :	YEAR:	
Month	Column 1	Column 2	Column 1 + Column 2
Wienian	This Month	Previous 11 Months	12 Month Total
	No deviation occurred in this  Deviation/s occurred in this of Deviation has been reported	quarter.	
Su Tit	bmitted by:		<u></u>
Sig	nature:		
Da Ph	te: one:		<u> </u>

Significant Permit Modification No. 145-36883-00035 Modified By: Madhurima Moulik

Permit Reviewer: Curtis Taylor/Madhurima Moulik

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

## **Part 70 Quarterly Report**

Source Name:	Bunge North America	(East), Inc.

Source Address: 700 N. Range Line Road, Morristown, Indiana 46161

Part 70 Permit No.: T145-36069-00035

Facility: Soybean Processing Facilities (B-Plant)

Parameter: Soybean throughput

Limit: Less than 1,073,159 tons of soybean processed per twelve (12) consecutive

month period, on an "as received" basis, with compliance determined at the end

of each month

QUA	RTER :	YEAR:				
Month	Column 1	Column 2	Column 1 + Column 2			
	This Month	Previous 11 Months	12 Month Total			
<ul> <li>□ No deviation occurred in this quarter.</li> <li>□ Deviation/s occurred in this quarter.</li> <li>□ Deviation has been reported on:</li> </ul>						
Deviation has been reported on:						

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Significant Permit Modification No. 145-36883-00035 Modified By: Madhurima Moulik

Permit Reviewer: Curtis Taylor/Madhurima Moulik

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

## **Part 70 Quarterly Report**

Source Name:	Bunge North America	(East), Inc.

Source Address: 700 N. Range Line Road, Morristown, Indiana 46161

Part 70 Permit No.: T145-36069-00035

Facility: Soybean Processing Facilities (A Plant (Existing))

Parameter: Hexane Usage

Limit: Less than 481.8 tons of hexane per twelve (12) consecutive month period with

compliance determined at the end of each month

QUA	RTER :	YEAR:				
Month	Column 1	Column 2	Column 1 + Column 2			
World	This Month	Previous 11 Months	12 Month Total			
	<u> </u>	<u> </u>				
□ No	o deviation occurred in this q	uarter.				
□ De	eviation/s occurred in this qu eviation has been reported c	arter.				
Submitted by:						
l itle Sian	/ Position:ature:		<u></u>			
Date	c					
Phor	Je.					

Significant Permit Modification No. 145-36883-00035 Modified By: Madhurima Moulik

Permit Reviewer: Curtis Taylor/Madhurima Moulik

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

### **Part 70 Quarterly Report**

Source Name:	Bunge North America	(East), Inc.

Source Address: 700 N. Range Line Road, Morristown, Indiana 46161

Part 70 Permit No.: T145-36069-00035

Facility: Boiler No. 2

Parameter: No. 2 fuel oil usage limit

Limit: 6,343,949 gallons of No. 2 fuel oil per twelve (12) consecutive month period.

QL	ARTER :	_ YEAR <u>:</u>	
Month	Column 1	Column 2	Column 1 + Column 2
onar	This Month	Previous 11 Months	12 Month Total
<u> </u>	No deviation occurred in this	quarter.	
	Deviation/s occurred in this of Deviation has been reported		
Sul Titl	omitted by:e / Position:		
Sig	nature:		
	te: one:		<u> </u>

Significant Permit Modification No. 145-36883-00035 Modified By: Madhurima Moulik

Permit Reviewer: Curtis Taylor/Madhurima Moulik

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

### **Part 70 Quarterly Report**

Source Name:	Bunge North America	ı (East), Inc.
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Source Address: 700 N. Range Line Road, Morristown, Indiana 46161

Part 70 Permit No.: T145-36069-00035

Facility: Boiler No. 2

Parameter: Vegetable oil usage limit

Limit: 4,540,000 gallons of vegetable oil per twelve (12) consecutive month period.

QUA	RTER :	YEAR:	
Month	Column 1	Column 2	Column 1 + Column 2
WORLT	This Month	Previous 11 Months	12 Month Total
			1
□ No	deviation occurred in this q	uarter.	
	eviation/s occurred in this que viation has been reported of		
Title , Signa	/ Position: ature:		

Source Name:

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Modified By: Madhurima Moulik
Permit Reviewer: Curtis Taylor/Madhurima Moulik

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT

COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Bunge North America (East), Inc.

Source Address: 700 N. Range Line Road, Morristown, Indiana 46161 Part 70 Permit No.: T145-36069-00035 Months: \_\_\_\_\_ to \_\_\_\_ Year: \_\_\_\_\_ Page 1 of 2 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:** 

Bunge North America (East), Inc. Significant Morristown, Indiana Permit Reviewer: Curtis Taylor/Madhurima Moulik

Significant Permit Modification No. 145-36883-00035 Modified By: Madhurima Moulik

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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:	

## Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification and Significant Permit Modification

#### **Source Description and Location**

Source Name: Bunge North America (East), Inc.

Source Location: 700 N. Range Line Road, Morristown, IN 46161

County: Shelby

SIC Code: 2075 (Soybean Oil Mills), 5153 (Grain and Field

Beans)

Permit Renewal No.: T145-36069-00035
Operation Permit Issuance Date: July 1, 2016
Significant Source Modification No.: 145-36878-00035
Significant Permit Modification No.: 145-36883-00035
Permit Reviewer: Madhurima Moulik

#### **Existing Approvals**

The source was issued Part 70 Operating Permit Renewal No. T145-36069-00035 on July 1, 2016. There have been no subsequent approvals issued.

#### **County Attainment Status**

The source is located in Shelby County.

Pollutant	Designation				
SO <sub>2</sub>	Better than national standards.				
CO	Unclassifiable or attainment effective November 15, 1990.				
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>				
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.				
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.				
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.				
NO <sub>2</sub>	Cannot be classified or better than national standards.				
Pb	Unclassifiable or attainment effective December 31, 2011.				
<sup>1</sup> Unclassifiab	<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was				
revoked effect	ctive 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. Shelby 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<sub>2.5</sub>
Shelby County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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#### (c) Other Criteria Pollutants

Shelby County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

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, however, there is an applicable New Source Performance Standard that was in effect on August 7, 1980 (40 CFR 60, Subpart DD), therefore fugitive emissions from the affected facility to which the New Source Performance Standard is applicable, are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

#### **Greenhouse Gas (GHG) Emissions**

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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

#### Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

		Source-Wide Emissions Before Modification (ton/year)								
Process / Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO₂	NO <sub>X</sub>	voc	со	Lead or (Other)	Single HAP*	Combined HAPs
Total for Source	373.47	321.82	1290.50	747.49	246.20	410.56	137.29		>10	>25
PSD Major Source Thresholds	250	250	250	250	250	250	250			
*Sinale h	ighest sou	ırce-wide l	HAP.							

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant, PM, is emitted at a rate of 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 a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

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(c) These emissions are based on the Appendix A to Technical Support Document for Part 70 Renewal No. T145-36069-00035 and corrections made during this permitting action to combustion emission factors for Column Dryer (Pt#3), Refinery Boiler (R-107), Murray Boiler (aka Boiler No.1), and Boiler No. 2. Emission factor conversions from lb/MMCF and lb/kgal to lb/MMBtu have been corrected. See Appendix A to this Technical Support Document for detailed methodologies and emission factor sources and conversions.

#### **Description of Proposed Modification**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Bunge North America (East), Inc. on February 26, 2016, relating to the incorporation of consent decree requirements as outlined in Consent Decree No. 2:06-CV-02209-MPM-DGB, United States v. Bunge North America (East), LLC and others.

#### **Enforcement Issues**

There are no pending enforcement actions related to this modification.

#### Permit Level Determination - Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency."

There is no change to the uncontrolled potential to emit of the source as a result of this modification.

- (a) Pursuant to 326 IAC 2-7-10.5(b)(2), a Significant Source Modification is required because this modification is incorporating the requirements set forth in a federal consent decree. The federal consent decree requirements are being incorporated through the State of Indiana's Construction Approval requirements.
- (b) Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification does not qualify as a Minor Permit Modification or as an Administrative Amendment. The Significant Permit Modification is incorporating the Significant Source Modification into the operating permit.

#### Permit Level Determination - PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 New Source Review Permit, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

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		Potent	ial To Em	it of the	Entire So	ource Afte	r Issuan	ce (tons/	/ear)
Process/ Emission Unit	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	СО	Total HAPs	Worst Single HAP
Grain receiving system, whole bean transfer, receiving and screening system (Pt#1)	24.48	9.99	59.60	-	-	-	-	-	-
Milling Operations (Pt #4)	5.69	5.69	216.81	-	-	-	-	-	-
A Flaking & Conveying (Pt #6)	3.02	3.94	26.02	-	-	-	-	-	-
Flow coating material bin (Pt #11)	0.11	0.11	52.56	-	-	-	-	-	-
Truck meal loadout operations (Pt #12)	7.23	7.23	44.68	-	-	-	-	-	-
Rail meal loadout operations (Pt #13)	0.44	0.44	44.68	-	-	-	-	-	-
A Extractor & Processing (Pt #9)	-	-	-	-	-	48.18	-	24.18	24.18 Hexane
DTDC meal dryers, #1 and #2 (Pt #7)	16.64	18.79	36.27	-	-	64.24	-	-	-
DTDC meal coolers, #1 and #2 (Pt #8)	24.97	24.97	36.27	-	-	64.24	-	-	-
Vegetable oil refinery process (R-101 through R- 106)	4.51	4.51	4.51	-	-	< 25.00	-	< 9.90	9.90 Hexane
Pellet Mill Operations (EU #26, Pt #26)	24.48	14.50	119.50	-	-	-	-	-	-
Grain screening operations (Pt #5)	6.66	6.66	66.59	ı	ı	-	ı	-	-
B Bean Heater (EU #16b, Pt #25)	2.72	15.02	40.93	ı	-	-	ı	-	-
B Hot Dehulling (EU #17b, Pt #18)	113.00	113.00	280.32	-	-	-	-	-	-
B Flaking (EU #27b, Pt #19)	3.02	4.2	37.84	-	-	-	-	-	-
B Meal Dryer (#1 & #2, Pt #21)	19.97	30.97	36.27	-	-	80.98	-	-	-
B Meal Cooler (#3, Pt # 22)	56.15	56.15	38.28	-	-	80.98	-	-	-
Meal Sizing (Grinding) (EU #39b, Pt #24)	5.65	6.31	119.14	-	-	-	-	-	-
B Extractor & Processing (#32b, 33b, 34b, 35b, Pt #23)	-	-	-	-	-	36.76	-	24.18	24.18 Hexane

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		Potential To Emit of the Entire Source After Issuance (tons/year)										
Process/			PM <sub>2.5</sub> *					Total	Worst Single			
Emission Unit	PM	PM <sub>10</sub> *	*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	HAPs	HAP			
Column dryer (Pt #3)	13.25	3.31	3.31	-	-	-	-	-	-			
Column dryer (Pt #3) (combustion)	0.16	0.65	0.65	0.05	8.59	0.47	7.21	0.16	0.15 Hexane			
Refinery Boiler (R-107) (combustion)	0.11	0.42	0.42	0.03	5.58	0.31	4.69	0.11	0.10 Hexane			
Murray Boiler (Boiler No. 1) (worst case)	6.73	6.91	6.73	210.24 21.32	61.52	2.27	34.63	0.78	0.74 Hexane			
Boiler No. 2 (worst case)	10.50	10.50	16.82	525.60 22.52	149.27 153.79	5.67	86.57	1.94	1.86 Hexane			
Four (4) emergency generators	1.12	1.12	1.12	1.04	15.78	1.28	3.4	0.01	-			
Eight (8) space heaters	0.02	0.07	0.07	0.01	0.94	0.05	0.79	0.02	0.02 (Hexane)			
Graymills Scrub Station (Parts Washer)	0.0	0.0	0.0	0.0	0.0	0.13	0.0	0.13	0.13			
Paved Roads	22.83	4.57	1.12	-	-	-	-	-	-			
Total PTE of Entire Source	373.47	321.82	1290.50	736.98 44.98	241.96 246.20	410.56	137.29	61.40	481.80 (1) Hexane			
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10			
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA			

negl. = negligible

Particulate controls on the vegetable oil refinery process (R-101 through R-106) are considered integral parts of the process.

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant is emitted at a rate of 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 a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

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

Due to the modification at this source, federal rule applicability has been reviewed as follows:

### **New Source Performance Standards (NSPS):**

There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) (a) included in the permit for this proposed modification.

#### **National Emission Standards for Hazardous Air Pollutants (NESHAP):**

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

<sup>\*</sup> 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".

<sup>\*\*</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>(1)</sup> Hexane emissions from the source shall not exceed 1.2 (lb/ton) and be limited to less than 803,000 (ton/yr) oil extracted.

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#### **Compliance Assurance Monitoring (CAM):**

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing (a) pollutant-specific emission unit that meets the following criteria:

- has a potential to emit before controls equal to or greater than the major source threshold (1) for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.
- (b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.
- Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406. (c) 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO<sub>2</sub> and NO<sub>X</sub> under the Acid Rain Program.
- (d) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

There are no changes being made to CAM applicability as a result of this modification.

#### **State Rule Applicability Determination**

There have been no changes to state rule applicability a result of this modification.

#### **Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to assure 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 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Sections D and E 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 Sections D and E 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.

There are no changes to compliance determination or monitoring requirements in the D Sections of the permit as a result of this modification. New compliance determination and monitoring requirements are included in Section E.1 as a result of incorporating the Consent Decree requirements and are identified in the Proposed Changes section below.

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#### **Proposed Changes**

The following changes listed below are due to the proposed modification. Deleted language appears as strikethrough text and new language appears as **bold** text:

- Section E.1 Federal Consent Decree Requirements has been revised to incorporate additional (1) requirements outlined in Consent Decree No. 2:06-CV-02209-MPM-DGB.
- (2) Emission unit descriptions for the Murray boiler and Boiler No. 2 have been revised throughout the permit.
- (3)Condition D.7.1 has been revised to remove Consent Decree sulfur content limits, to correct typographical errors, and update permit language. All Consent Decree requirements are now included in Section E.1.
- (4) A quarterly reporting requirement has been added to Condition D.7.15 and a Quarterly Report Form has been added to the end of the permit for the documentation of compliance with the existing vegetable oil usage limit in Condition D.7.1(d).
- (5) Additional typographical errors have been corrected.
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (n) One (1) boiler, identified as the Murray boiler (aka Boiler No. 1), constructed in 1996, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 96 million Btu per hour, exhausting to Murray Stack (aka Stack Pt #14).
  - Under 40 CFR 60, NSPS Subpart Dc, Murray boiler is an affected facility.
  - Under 40 CFR 63, Subpart DDDDD, Murray boiler is an affected source.

- (bi) One (1) boiler, identified as Boiler No. 2, constructed in 2003, firing natural gas, vegetable oil. #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 240 million Btu per hour, controlled by low NOx burners and flue gas recirculation, equipped with a continuous emission monitoring system (CEMS) for NOx, and exhausting at stack Pt #
  - Under 40 CFR 60, Subpart Db, Boiler No. 2 is an affected facility.
  - Under 40 CFR 63, Subpart DDDDD, Boiler No. 2 is an affected source.

- Volatile Organic Compounds (VOC) [326 IAC 8-1-6] D.3.1
  - The soybeans processed by the "A" plant, on an "as received" basis, shall be limited to (a) less than 828,837 tons per twelve (12) consecutive month period (equivalent to an oil extraction process throughput of 803,000 tons per twelve (12) consecutive month period,) with compliance determined at the end of each month.

#### Volatile Organic Compounds (VOC) [40 CFR Part 64] D.3.6

In order to assure compliance with Condition D.3.1, the mineral oil absorber for the A Oil extraction and processing operations, DTDC meal dryers (#1 & #2), and DTDC meal coolers (#1

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& #2) shall operate at all times that the A Oil extraction and processing operations, DTDC meal dryers (#1 & #2), and DTDC meal coolers (#1 & #2) are in operation.

...

#### SECTION D.4 EMISSION UNIT OPERATION CONDITIONS

#### **Emission Unit Description:**

(n) One (1) boiler, identified as the Murray boiler (aka Boiler No. 1), constructed in 1996, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 96 million Btu per hour, exhausting to Murray Stack (aka Stack Pt #14).

Under 40 CFR 60, Subpart Dc, Murray boiler is an affected facility.

Under 40 CFR 63, Subpart DDDDD, Murray boiler is an affect source.

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

...

#### D.6.3 Particulate Control [326 IAC 2-7-6(6)] [40 CFR Part 64]

In order to assure compliance with Conditions D.6.1 and D.6.2, the cyclone for particulate control shall be in operation and control emissions from the Pellet Mill and Cooler (Pt #26) at all times that the Pellet Mill and Cooler emission unit is in operation.

. . .

#### D.6.5 Visible Emissions Notations [40 CFR Part 64]

(a) Once per day visible emission notations of the Pellet Mill and Cooler (Pt #26) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

•••

#### D.6.6 Cyclone Failure Detection [40 CFR Part 64]

In the event that cyclone failure has been observed:

...

#### SECTION D.7 EMISSION UNIT OPERATION CONDITIONS

#### **Emission Unit Description:**

• • •

(bi) One (1) boiler, identified as Boiler No. 2, constructed in 2003, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 240 million Btu per hour, controlled by low NOx burners and flue gas recirculation, equipped with a continuous emission monitoring system (CEMS) for NOx, and exhausting at stack Pt # 20.

Under 40 CFR 60, Subpart Db, Boiler No. 2 is an affected facility.

Under 40 CFR 63, Subpart DDDDD, Boiler No. 2 is an affected source;

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

. . .

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#### PSD Minor Limit [326 IAC 2-2][Morristown, Indiana CTP]

Pursuant to SSM145-9618-00035, as modified in T145-36069-00035, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable:

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- (c) The amount of distillate oil with 0.95% sulfur maximum, combusted in the Boiler No. 2 shall be limited to 6,343-,949 gallons per twelve (12) consecutive month period, with compliance determined at the end of each months rolled on a monthly basis. Distillate oil shall not exceed 0.05% Sulfur by weight. These distillate oil limitations are required to limit SO<sub>2</sub> emissions to 249 tons per twelve (12) consecutive month period, rolled on a monthly basis.
- The amount of vegetable oil combusted in Boiler No. 2 shall not exceed 4.540,000 (d) gallons per twelve (12) consecutive month period, with compliance determined at the end of each months rolled on a monthly basis. When using blends of vegetable oil and distillate fuel oil, only the volume of fuel which is vegetable oil shall count toward the usage limit.
- (e) When burning vegetable oil, or blends of vegetable oil and distillate fuel oil, PM<sub>10</sub> emissions shall not exceed 0.016 pounds per million Btu heat input. This limit in combination with the vegetable oil usage limit in D.7.1(ed) is required to restrict the emissions of PM<sub>10</sub> from Boiler No. 2 to less than 10.5 tons per twelve (12) month period, rolled on a monthly basis.

Volatile Organic Compounds (VOC) [40 CFR Part 64] D.7.7

> In order to assure compliance with Condition D.7.5, the absorber shall be operated at all times the oil extractor process is in operation at an average mineral oil flow rate established during the latest VOC (hexane) test.

#### D.7.14 VOC Monitoring [40 CFR Part 64]

In order to assure compliance with Condition D.7.4, the following monitoring requirements apply:

#### D.7.15 Record Keeping Requirements

Pursuant to 326 IAC 2-1-3(i) and 326 IAC 2-2:

- To document the compliance status with Condition D.7.1 (a), the Permittee shall maintain (a) records of the soybean processed by B-Plant and fuel oil #2 burned in Boiler No. 2.
- (b) To document the compliance status with Condition D.7.1 (c), the Permittee shall maintain records of the sulfur content in fuel oil #2 burned in Boiler No. 2 and the total amount of #2 fuel oil combusted.
- (c) To document the compliance status with Condition D.7.1 (d), the Permittee shall maintain records of the total amount of vegetable oil combusted in Boiler No. 2.
- (**d**e) ... (**e**d) ... (fe) ... (**g**f) (hg)... (ih)

(**j**i)

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#### **SECTION E.1**

#### CONSENT DECREE

#### Facility Emission Unit Description [326 IAC 2-7-5(14)]:

The following solvent extraction processes are subject to consent decree entered on January 16, 2007, in Civil Action No. 2:06-CV-02209, United States District Court for the Central District of Illinois, in which the Permittee and IDEM were parties:

- The vegetable oil production processes as defined in 40 CFR 63.2872. (a)
- (b) One (1) boiler, identified as the Murray boiler (aka Boiler No. 1), constructed in 1996, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 96 million Btu per hour, exhausting to Murray Stack (aka Stack Pt #14).
  - Under 40 CFR 60, Subpart Dc, Murray boiler is an affected facility.
  - Under 40 CFR 63, Subpart DDDDD, Murray boiler is an affected source.
- (c) One (1) boiler, identified as Boiler No. 2, constructed in 2003, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 240 million Btu per hour, controlled by low NOx burners and flue gas recirculation, equipped with a continuous emission monitoring system (CEMS) for NOx, and exhausting at stack Pt # 20.
  - Under 40 CFR 60, Subpart Db, Boiler No. 2 is an affected facility.
  - Under 40 CFR 63, Subpart DDDDD, Boiler No. 2 is an affected source.

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

...

VOC SLR Consent Decree Limits, Compliance, and Record Keeping Requirements E.1.1

#### E.1.2 NOx Combustion Consent Decree Limits, Compliance, and Record Keeping Requirements

- Pursuant the Consent Decree entered on January 16, 2007, in Civil Action No. 2:06-(a) CV-02209, the NOx emissions from Boiler No. 2 shall not exceed 0.05 lb/MMBtu.
- (b) The Permittee shall install, calibrate, certify, maintain, evaluate, and operate a NOx continuous emissions monitoring system (CEMS) on Boiler No. 2. All monitoring data shall be collected and recorded and maintained onsite in accordance with the requirements of 40 CFR Part 60, 326 IAC 3-5-2, and 326 IAC 3-5-3.
- The Permittee shall comply with the applicable provisions of 326 IAC 3-5-4 and 326 (c) IAC 3-5-5.
- (d) In order to document the compliance status with (a) and (b) above, the Permittee shall record the output of the continuous monitoring system and shall perform the required record keeping pursuant to 326 IAC 3-5-6.
- (e) The Permittee shall perform the required reporting requirements pursuant to 326 IAC 3-5-7,

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(f) A semi-annual summary of the information to document the compliance status with (a) above shall be submitted not later than thirty (30) days after the semi-annual period being reported. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

#### E.1.3 SO2 Combustion Consent Decree Limits, Compliance, and Record Keeping Requirements

- (a) Pursuant the Consent Decree entered on January 16, 2007, in Civil Action No. 2:06-CV-02209, the sulfur content of the fuel oil combusted in Murray Boiler (Boiler No. 1) and Boiler No.2 shall not exceed 0.05% by weight.
- (b) Compliance with the sulfur content limit established in (a) shall be determined utilizing one of the following options.
  - (1) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur content of the fuel oil does not exceed 0.05% by weight, by:
    - (A) Providing vendor analysis of the sulfur content of the fuel delivered, if accompanied by a vendor certification; or
    - (B) Analyzing the fuel sample to determine the sulfur content of the fuel via the procedures in 40 CFR 60, Appendix A, Method 19.
      - (i) Fuel samples may be collected from the fuel tank immediately after the fuel tank is filled and before any fuel is combusted; and
      - (ii) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
  - (2) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 96 MMBtu and/or 240 MMBtu per hour boilers, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.
- (c) To document the compliance status with (a) and (b) above, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (5) below shall be taken monthly and shall be complete and sufficient to establish compliance with the limits established (a) and (b) above.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fuel usage and sulfur content for No. 2 fuel oil used at the source since the last compliance determination period;
  - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and
  - (4) If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:
    - (i) Fuel supplier certifications;
    - (ii) The name of the fuel supplier; and
    - (iii) A statement from the fuel supplier that certifies the sulfur content of the No. 2 fuel oil.

Morristown, Indiana

TSD for TVOP SSM No.: 145-36878-00035 Permit Reviewer: Madhurima Moulik TSD for TVOP SPM No.: 145-36883-00035

SECTION F.2 **NSPS** 

#### Emission Unit Description:

(n) One (1) boiler, identified as the Murray boiler (aka Boiler No. 1), constructed in 1996, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 96 million Btu per hour, exhausting to Murray Stack(aka Stack Pt #14).

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Under 40 CFR 60, NSPS Subpart Dc, Murray boiler is an affected facility.

Under 40 CFR 63, Subpart DDDDD, Murray boiler is an affected source;

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

SECTION F.3 **NSPS** 

#### **Emission Unit Description:**

One (1) boiler, identified as Boiler No. 2, constructed in 2003, firing natural gas, vegetable (bir) oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 240 million Btu per hour, controlled by low NOx burners and flue gas recirculation, equipped with a continuous emission monitoring system (CEMS) for NOx, and exhausting at stack Pt # 20.

Under 40 CFR 60, Subpart Db, Boiler No. 2 is an affected facility.

Under 40 CFR 63, Subpart DDDDD, Boiler No. 2 is an affected source.

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

Morristown, Indiana

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SECTION F.5 **NESHAP** 

#### **Emission Unit Description:**

(n) One (1) boiler, identified as the Murray boiler (aka Boiler No. 1), constructed in 1996, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 96 million Btu per hour, exhausting to Murray Stack (aka Stack Pt#14).

Under 40 CFR 60 Subpart Dc, Murray boiler is an affected facility.

Under 40 CFR 63, Subpart DDDDD, Murry boiler is an affected source.

- One (1) vegetable oil refinery process, constructed in 2002, with a maximum throughput rate of (o) 60 ton/hr, consisting of crude vegetable oil receiving, storage, filtration, and degumming equipment; lecithin drying and processing equipment; oil refining, deodorizing, and filtration equipment; bulk oil handling, blending, storage, and loadout facilities; and including the following equipment:
  - One (1) natural gas-fired refinery boiler, identified as R-107, with a maximum heat (7) input rating of 13 MMBtu/hr, exhausting to Stack R-107.

Under 40 CFR 63, Subpart DDDDD, R-107 is an affected source.

(bir) One (1) boiler, identified as Boiler No. 2, constructed in 2003, firing natural gas, vegetable oil, #2 distillate fuel oil, or blends of vegetable oil and #2 distillate fuel oil, rated at 240 million Btu per hour, controlled by low NOx burners and flue gas recirculation, equipped with a continuous emission monitoring system (CEMS) for NOx, and exhausting at stack Pt # 20.

Under 40 CFR 60, Subpart Db, Boiler No. 2 is an affected facility.

Under 40 CFR 63, Subpart DDDDD, Boiler No. 2 is an affected source.

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

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

#### Part 70 Quarterly Report

Source Name: Bunge North America (East), Inc.

Source Address: 700 N. Range Line Road, Morristown, Indiana 46161

Part 70 Permit No.: T145-36069-00035

Facility: Boiler No. 2

Parameter: Soybean throughput SO<sub>2</sub>-emissions limit (249 tons per twelve (12) consecutive

month period) and No. 2 fuel oil usage limit-

Limit: 6,343,949 gallons of No. 2 fuel oil per twelve (12) consecutive month period.

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Morristown, Indiana

Permit Reviewer: Madhurima Moulik

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

#### **Part 70 Quarterly Report**

Source Name: Bunge North America (East),	, Inc.
--	--------

Source Address: 700 N. Range Line Road, Morristown, Indiana 46161

Part 70 Permit No.: T145-36069-00035

Facility: Boiler No. 2

Parameter: Vegetable oil usage limit

Limit: 4,540,000 gallons of vegetable oil per twelve (12) consecutive month

period.

8.6 4.1-	Column 1	Column 2	Column 1 + Column 2
Month	This Month	Previous 11 Months	12 Month Tota
	No deviation occurred in th	is quarter.	
	Deviation/s occurred in this	•	
	Deviation has been reported		
Sı	ıbmitted bv:		
-	lbmitted by: tle / Position:		
Tit			
Si	gnature: tte:		

#### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on February 26, 2016.

Permit Reviewer: Madhurima Moulik

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This proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 145-36878-00035. The operation of this proposed modification shall be subject to the conditions of the attached Significant Permit Modification No. 145-36883-00035.

The staff recommend to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Madhurima Moulik 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) 233-0868 or toll free at 1-800-451-6027, extension 3-0868.
- (b) A copy of the findings is available on the Internet at: <a href="http://www.in.gov/ai/appfiles/idem-caats/">http://www.in.gov/ai/appfiles/idem-caats/</a>
- (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: <a href="http://www.in.gov/idem/5881.htm">http://www.in.gov/idem/5881.htm</a>; and the Citizens' Guide to IDEM on the Internet at: <a href="http://www.in.gov/idem/6900.htm">http://www.in.gov/idem/6900.htm</a>.

#### TSD Appendix A: Emission Calculations Potential to Emit Summary

Company Name: Bunge North America (East), Inc. Source Address: 700 N. Rangeline Rd., Morristown, IN 46161 SSM and SPM No.: 145-36878-00035 and 145-36883-00035

Reviewer: Madhurima Moulik

#### Uncontrolled PTE (ton/yr)

				•	ilconti one	<u> </u>	,,			
Process	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	СО	voc	Total HAPs	Worst Si	ngle HAP
Truck Receiving Operations (Pt#1)	201.52	59.60	59.60	-	-	-	-	-	-	
Rail Receiving & Conveying (Pt #1)	56.06	13.67	13.67	-	-	-	-	-	-	
Milling Operations (Pt #4)	156.10	216.81	216.81	-	-	-	-	-	-	
A Flaking & Conveying (Pt #6)	43.36	26.02	26.02	-	-	-	-	-	-	
Flow coating material bin (Pt #11)	183.96	52.56	52.56	-	-	-	-	-	-	
Truck meal loadout operations (Pt #12)	446.76	44.68	44.68	-	-	-	-	-	-	
Rail meal loadout operations (Pt #13)	80.15	44.68	44.68	-	-	-	-	-	-	
A Extractor & Processing (Pt #9)	-	-	-	-	-	-	987.25	987.25	987.25	Hexane
DTDC meal dryers, #1 and #2 (Pt #7)	36.27	36.27	36.27	-	-	-	-	-	-	
DTDC meal coolers, #1 and #2 (Pt #8)	36.27	36.27	36.27	-	-	-	-	-	-	
Vegetable oil refinery process (R-101 through R-106)	4.51	4.51	4.51	-	-	-	-	-	-	
Pellet Mill Operations (EU #26, Pt #26)	239.00	119.50	119.50	-	-	-	-	-	-	
Grain screening operations (Pt #5)	225.15	66.59	66.59	-	-	-	-	-	-	
B Bean Heater (EU #16b, Pt #25)	40.93	40.93	40.93	-	-	-	-	-	-	
B Hot Dehulling (EU #17b, Pt #18)	201.83	280.32	280.32	-	-	-	-	-	-	
B Flaking (EU #27b, Pt #19)	151.37	37.84	37.84	-	-	-	-	-	-	
B Meal Dryer (#1 & #2, Pt #21)	36.27	36.27	36.27	-	-	-	-	-	-	
B Meal Cooler (#3, Pt # 22)	38.28	38.28	38.28	-	-	-	-	-	-	
Meal Sizing (Grinding) (EU #39b, Pt #24)	119.14	119.14	119.14	-	-	-	-	-	-	
B Extractor & Processing (#32b, 33b, 34b, 35b, Pt #23)	-	-		-	-	-	987.25	987.25	987.25	Hexane
Column Dryer (Pt #3)	13.25	3.31	3.31	-	-	-	-	-	-	
Column Dryer (Pt #3) (combustion)	0.16	0.65	0.65	0.05	8.59	7.21	0.47	0.16	0.15	Hexane
Refinery Boiler (R-107) (combustion)	0.11	0.42	0.42	0.03	5.58	4.69	0.31	0.11	0.10	Hexane
Murray Boiler (Boiler No. 1) (worst case)	6.73	6.91	6.73	213.24	61.52	34.63	2.27	0.78	0.74	Hexane
Boiler No. 2 (worst case)	16.82	17.27	16.82	533.11	153.79	86.57	5.67	1.94	1.86	Hexane
Eight (8) Space Heaters	0.02	0.07	0.07	0.01	0.94	0.79	0.05	0.02	0.02	Hexane
Four (4) Emergency Generators	1.12	1.12	1.12	1.04	15.78	3.40	1.28	0.01	0.00	
Graymills Scrub Station (Parts Washer)	0.00	0.00	0.00	0.00	0.00	0.00	0.13	0.13	0.13	
Paved Roads	22.83	4.57	1.12	-	-	-	-	-		
Totals	2,357.95	1,308.24	1,304.16	747.49	246.20	137.29	1,984.68	1,977.66	1,977.51	Hexane

The baghouses associated with Vegetable oil refinery process (R-101 through R-106) are considered as an integral part of the process.

Controlled PTE (ton/yr)

				(	ontrollea	PIE (ton/	yr)			
Process	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	СО	voc	Total HAPs	Worst S	ingle HAP
Truck Receiving Operations (Pt#1)	9.37	9.37	9.37	-	-	-	-	-	-	
Rail Receiving & Conveying (Pt #1)	0.62	0.62	0.62	-	-	-	-	-	-	
Milling Operations (Pt #4)	5.69	5.69	5.69	-	-	-	-	-	-	
A Flaking & Conveying (Pt #6)	3.04	3.04	3.04	-	-	-	-	-	-	
Flow coating material bin (Pt #11)	0.11	0.11	0.11	-	-	-	-	-	-	
Truck meal loadout operations (Pt #12)	7.23	7.23	7.23	-	-	-	-	-	-	
Rail meal loadout operations (Pt #13)	0.44	0.44	0.44	-	-	-	-	-	-	
A Extractor & Processing (Pt #9)	-	-	-	-	-	-	24.18	24.18	24.18	Hexane
DTDC meal dryers, #1 and #2 (Pt #7)	16.64	16.64	16.64	-	-	-	32.24	-	-	
DTDC meal coolers, #1 and #2 (Pt #8)	24.97	24.97	24.97	-	-	-	32.24	-	-	
Vegetable oil refinery process (R-101 through R-106)	4.51	4.51	4.51	-	-	-	-	-	-	
Pellet Mill Operations (EU #26, Pt #26)	12.00	6.00	6.00	-	-	-	-	-	-	
Grain screening operations (Pt #5)	6.66	6.66	6.66	-	-	-	-	-	-	
B Bean Heater (EU #16b, Pt #25)	2.72	2.72	2.72	-	-	-	-	-	-	
B Hot Dehulling (EU #17b, Pt #18)	114.32	114.32	114.32	-	-	-	-	-	-	
B Flaking (EU #27b, Pt #19)	3.02	3.02	3.02	-	-	-	-	-	-	
B Meal Dryer (#1 & #2, Pt #21)	19.97	19.97	19.97	-	-	-	32.24	-	-	
B Meal Cooler (#3, Pt # 22)	16.51	16.51	16.51	-	-	-	32.24	-	-	
Meal Sizing (Grinding) (EU #39b, Pt #24)	5.65	5.65	5.65	-	-	-	-	-	-	
B Extractor & Processing (#32b, 33b, 34b, 35b, Pt #23)	-	-	-	-	-	-	24.18	24.18	24.18	Hexane
Column Dryer (Pt #3)	13.25	3.31	3.31	-	-	-	-	-	-	
Column Dryer (Pt #3) (combustion)	0.16	0.65	0.65	0.05	8.59	7.21	0.47	0.16	0.15	Hexane
Refinery Boiler (R-107) (combustion)	0.11	0.42	0.42	0.03	5.58	4.69	0.31	0.11	0.10	Hexane
Murray Boiler (Boiler No. 1) (worst case)	6.73	6.91	6.73	213.24	61.52	34.63	2.27	0.78	0.74	Hexane
Boiler No. 2 (worst case)	16.82	17.27	16.82	533.11	153.79	86.57	5.67	1.94	1.86	Hexane
Eight (8) Space Heaters	0.02	0.07	0.07	0.01	0.94	0.79	0.05	0.02	0.02	
Four (4) Emergency Generators	1.12	1.12	1.12	1.04	15.78	3.40	1.28	0.01	0.00	
Graymills Scrub Station	0.00	0.00	0.00	0.00	0.00	0.00	0.13	0.13	0.13	
Paved Roads	22.83	4.57	1.12	-	-	-	-	-	-	
Totals	314.50	281.80	277.72	747.49	246.20	137.29	187.48	51.51	51.36	Hexane

Totals | 314.50 | 281.80 | 277.72 | 747.49 | 246.20 | 137.29 | 187.48 | 51.51 | 51.36 | Hex Note: Uncontrolled VOC applied only to A and B Extractor & Processing, but Controlled VOC includes emissions from meal dryers and coolers.

#### TSD Appendix A: Emission Calculations Potential to Emit Summary

Company Name: Bunge North America (East), Inc.

Source Address: 700 N. Rangeline Rd., Morristown, IN 46161 SSM and SPM No.: 145-36878-00035 and 145-36883-00035

Reviewer: Madhurima Moulik

## TSD Appendix A: Emission Calculations Potential to Emit Summary

#### After Issuance of Permit PTE (ton/yr)

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Process	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	СО	voc	Total HAPs	w	orst Single	HAP
Grain receiving system, whole bean transfer, receiving and screening operation (includes truck receiving, rail receiving and conveying)	24.48	9.99	59.60	-	-	-	-		-		
Milling Operations (Pt #4)	5.69	5.69	216.81	-	-	-	-	-	-		1
A Flaking & Conveying (Pt #6)	3.02	3.02	26.02	-	-	-	-	-	-		1
Flow coating material bin (Pt #11)	0.11	0.11	52.56	-	-	-	-	-	-		1
Truck meal loadout operations (Pt #12)	7.23	7.23	44.68	-	-	-	-	-	-		1
Rail meal loadout operations (Pt #13)	0.44	0.44	44.68	-	-	-	-	-	-		1
A Extractor & Processing (Pt #9)	-		-	-	-	-	48.18	24.18	24.18	Hexane	1
DTDC meal dryers, #1 and #2 (Pt #7)	16.64	16.64	36.27	-	-	-	64.24	-	-		1
DTDC meal coolers, #1 and #2 (Pt #8)	24.97	24.97	36.27	-	-	-	64.24	-	-		1
Vegetable oil refinery process (R-101 through R-106)	4.51	4.51	4.51	-	-	-	< 25.00	< 9.90	< 9.90	Hexane	
Pellet Mill Operations (EU #26, Pt #26)	24.48	14.50	119.50	-	-	-	-	-	-		
Grain screening operations (Pt #5)	6.66	6.66	66.59	-	-	-	-	-	-		
B Bean Heater (EU #16b, Pt #25)	2.72	2.72	40.93	-	-	-	-	-	-		
B Hot Dehulling (EU #17b, Pt #18)	113.00	113.00	280.32	-	-	-	-	-	-		481.80 (1)
B Flaking (EU #27b, Pt #19)	3.02	3.02	37.84	-	-	-	-	-	-		
B Meal Dryer (#1 & #2, Pt #21)	19.97	19.97	36.27	-	-	-	80.98	-	-		
B Meal Cooler (#3, Pt # 22)	56.15	56.15	38.28	-	-	-	80.98	-	-		1
Meal Sizing (Grinding) (EU #39b, Pt #24)	5.65	5.65	119.14	-	-	-	-	-	-		
B Extractor & Processing							00.70	04.40	04.40	Harris	
(#32b, 33b, 34b, 35b, Pt #23)	-	-	-	-	-	-	36.76	24.18	24.18	Hexane	
Column Dryer (Pt #3)	13.25	3.31	3.31	-	-	-	-	-	-		
Column Dryer (Pt #3) (combustion)	0.16	0.65	0.65	0.05	8.59	7.21	0.47	0.16	0.15	Hexane	
Refinery Boiler (R-107) (combustion)	0.11	0.42	0.42	0.03	5.58	4.69	0.31	0.11	0.10	Hexane	
Murray Boiler (Boiler No. 1) (worst case)	6.73	6.91	6.73	21.32	61.52	34.63	2.27	0.78	0.74	Hexane	1
Boiler No. 2 (worst case)	10.50	10.50	16.82	22.52	153.79	86.57	5.67	1.94	1.86	Hexane	1
Graymills Scrub Station	0.00	0.00	0.00	0.00	0.00	0.00	0.13	0.13	0.13		1
Eight (8) Space Heaters	0.02	0.07	0.07	0.01	0.94	0.79	0.05	0.02	0.02	Hexane	1
Four (4) Emergency Generators	1.12	1.12	1.12	1.04	15.78	3.40	1.28	0.01	0.00		1
Paved Roads	22.83	4.57	1.12	-	-	-	-	-	-		1
Totals	373.47	321.82	1290.50	44.98	246.20	137.29	410.56	61.40	481.80	Hexane	•

Note: Uncontrolled VOC applied only to A and B Extractor & Processing, but Controlled VOC includes emissions from meal dryers and coolers.

PM and PM10 emissions from the Truck Receiving Operations (Pt #1) shall not exceed the 5.59 (lb/hr) and 2.28 (lb/hr), respectively. Permit Condition D.1.1, 326 IAC 2-2

PM and PM10 emissions from the Milling operations (Pt #4) shall not exceed the 1.3 (lb/hr), each. Permit Condition D.2.1, 326 IAC 2-2

PM and PM10 emissions from the Flaking mill operations (Pt #6) shall not exceed the 0.69 and 0.90 (lb/hr), respectively. Permit Condition D.2.1, 326 IAC 2-2

PM and PM10 emissions from the Flow coating bin (Pt #11) shall not exceed the 0.026 (lb/hr), each. Permit Condition D.2.1, 326 IAC 2-2

PM and PM10 emissions from the Truck meal loadout operations (Pt #12) shall not exceed the 1.65 (lb/hr), each. Permit Condition D.2.1, 326 IAC 2-2 PM and PM10 emissions from the Rail meal loadout operations (Pt #13) shall not exceed the 0.10 (lb/hr), each. Permit Condition D.2.1, 326 IAC 2-2

PM and PM10 emissions from the DTDC meal dryers, #1 & #2 (Pt #7) shall not exceed the 3.8 and 4.29 (lb/hr), respectively. Permit Condition D.3.2, 326 IAC 2-2

PM and PM10 emissions from the DTDC meal coolers, #1 & #2 (Pt #8) shall not exceed the 5.7 (lb/hr), each. Permit Condition D.3.2, 326 IAC 2-2

PM emissions from the vegetable oil refinery process (R-101 through R-106) shall not exceed the 1.029 (lb/hr). Permit Condition D.5.1, 326 IAC 2-2

PM and PM10 emissions from the Pellet Mill and Cooler (Pt #26) shall not exceed the 5.59 (lb/hr) and 3.31 (lb/hr), respectively. Permit Condition D.6.1, 326 IAC 2-2 PM and PM10 emissions from the Grain Screening Operation (Pt #5) shall not exceed the 1.52 (lb/hr), each. Permit Condition D.7.1, 326 IAC 2-2

PM and PM10 emissions from the B Bean Heater (Pt #25) shall not exceed the 0.62 and 3.43 (lb/hr), respectively. Permit Condition D.7.1, 326 IAC 2-2

PM and PM10 emissions from the B bear Healer (Pt #25) shall not exceed the 0.02 and 3.43 (lb/hr), respectively. Permit Condition D.7.1, 326 IAC 2-2

PM and PM10 emissions from the B Flaking (Pt #19) shall not exceed the 0.96 (lb/hr), each. Permit Condition D.7.1, 326 IAC 2-2

PM and PM10 emissions from the B DTDC meal dryers, #1 & #2 (Pt #21) shall not exceed the 4.56 and 7.07 (lb/hr), respectively. Permit Condition D.7.1, 326 IAC 2-2 PM and PM10 emissions from the B DTDC meal coolers, #1 & #2 (Pt #22) shall not exceed the 12.82 (lb/hr), each. Permit Condition D.7.1, 326 IAC 2-2

PM and PM10 emissions from the meal sizing system (Pt #24) shall not exceed the 1.29 and 1.44 (lb/hr), respectively. Permit Condition D.7.1, 326 IAC 2-2

PM and PM10 emissions from the Boiler No. 2 (Pt #20) shall not exceed the 10.5 (ton/yr), each. Permit Condition D.7.1, 326 IAC 2-2

VOC emissions from scrub station = 40 gallons usage/yr x 0.79 g/cc x 8.3 (lb/gal per g/cc)/2000 lb per ton

VOC emissions from the A Extractor & Processing (Pt #9) shall not exceed the 0.12 (lb/ton). Permit Condition D.3.1, 326 IAC 8-1-6

VOC emissions from the DTDC meal dryers, #1 and #2 (Pt #7) and DTDC meal coolers, #1 and #2 (Pt #8) shall not exceed the 0.16 (lb/ton), each. Permit Condition D.3.1, 326 IAC 8-1-6

VOC emissions from the B Extractor & Processing (Pt #23) shall not exceed the 0.069 (lb/ton). Permit Condition D.7.4, 326 IAC 8-1-6

VOC emissions from the B Meal Dryer (#1 & #2, Pt #21) and B Meal Cooler (#3, Pt #22) shall not exceed the 0.152 (lb/ton), each. Permit Condition D.7.4, 326 IAC 8-1-6

VOC emissions from the vegetable oil refinery process (R-101 through R-106) shall not exceed 0.288 (lb/ton) and the total amount of off-site soybean oil processed shall not exceed 347,220,000 (lb/yr). Permit Condition D.5.5, 326 IAC 8-1-6

Single HAP (n-Hexane) emissions for the vegetable oil refinery process (R-101 through R-106) shall not exceed 0.114 (lb/ton) and the total amount of off-site soybean oil processed shall not exceed 347,220,000 (lb/yr). Permit Condition, D.5.4, 326 IAC 2-4.1

(1) Hexane emissions from the source shall not exceed 1.2 (lb/ton) and be limited to less than 803,000 (ton/yr) oil extracted. Permit Condition D.3.1, 326 IAC 8-1-6

The baghouses associated with Vegetable oil refinery process (R-101 through R-106) are considered as an integral part of the process.

NOx emissions from Boiler No. 2 shall not exceed 0.05 lb/MMBtu. Permit Condition E.1.2(a)

The sulfur content of No. 2 fuel oil combusted in Murray Boiler (Boiler No.1) and Boiler No.2 shall not exceed 0.05% by weight and the No. 2 Fuel Oil combusted in Boiler No. 2 shall not exceed 6,343,949 gallons per twelve (12) consecutive month period. Permit Conditions D.7.1(c) and E.1.3(a).

#### **Natural Gas Combustion Only** MM BTU/HR <100

Eight (8) Space Heaters H1 - H8

Company Name: Bunge North America (East), Inc.

Source Address: 700 N. Range Line Road, Morristown, IN 46161

SSM and SPM No.: 145-36878-00035 and 145-36883-00035

**Reviewer: Madhurima Moulik** 

**Heat Input Capacity** MMBtu/hr 2.2

HHV mmBtu mmscf 1020

Potential Throughput MMCF/yr2.2 18.9

		Pollutant									
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO				
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100	5.5	84				
					**see below						
Potential Emission in tons/yr	0.02	0.07	0.07	0.01	0.94	0.05	0.79				

<sup>\*</sup>PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

#### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutants (HAPs)

mazaraeae /m r ematame (m/m	٠,					
			HAPs	- Organics		
	Benzene	Dichlorob enzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.0E-05	1.1E-05	7.1E-04	0.02	3.2E-05	0.02

			HAF	Ps - Metals		
	Lead	Cadmium	Chromium	Manganes e	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.7E-06	1.0E-05	1.3E-05	3.6E-06	2.0E-05	5.2E-05
Methodology is the same as abo	Total HAPs	0.02				
The five highest organic and me	tal HAPs em	ission factor	rs are provided	above.	Worst HAP	0.02

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

<sup>\*\*</sup>Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

## Appendix A: Emission Calculations Reciprocating Internal Combustion Engines - Diesel Fuel Four (4) Emergency Fire Pumps

Company Name: Bunge North America (East), Inc.

Source Address: 700 N. Range Line Road, Morristown, IN 46161

SSM and SPM No.: 145-36878-00035 and 145-36883-00035

Reviewer: Madhurima Moulik

#### B. Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)
Maximum Hours Operated per Year
Potential Throughput (hp-hr/yr)

2036.0 500 1,018,000

		Pollutant										
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO					
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067					
Potential Emission in tons/yr	1.12	1.12	1.12	1.04	15.78	1.28	3.40					

<sup>\*</sup>PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

#### Hazardous Air Pollutants (HAPs)

nazaracac / ar r chatanto (								
				Pollutant				
								Total PAH
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	HAPs***
Emission Factor in lb/hp-hr*	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06
Potential Emission in tons/yr	3.32E-03	1.46E-03	1.02E-03	1.39E-04	4.20E-03	2.73E-03	3.30E-04	5.99E-04

<sup>\*\*\*</sup>PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

Potential Emission of Total HAPs (tons/yr) 1.38E-02

#### Methodology

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.4-1, 3.4-2, 3.4-3, and 3.4-4.

 $Potential\ Throughput\ (hp-hr/yr) = [Output\ Horsepower\ Rating\ (hp)]\ ^* \ [Maximum\ Hours\ Operated\ per\ Year]$ 

 $Potential\ Emission\ (tons/yr) = [Potential\ Throughput\ (hp-hr/yr)]\ ^* \\ [Emission\ Factor\ (lb/hp-hr)]\ /\ [2,000\ lb/ton]$ 

<sup>\*\*\*\*</sup>Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

## TSD Appendix A Graymills Scrub Station (Parts Washer)

Company Name: Bunge North America (East), Inc.

Source Address: 700 N. Range Line Road, Morristown, IN 46161

SSM and SPM No.: 145-36878-00035 and 145-36883-00035

Reviewer: Madhurima Moulik

Unit	Usage (gal/yr)	Density (g/cm3)	Density (lb/gal)	VOC/HAP Content	VOC/HAP Emissions lb/yr)	VOC/HAP Potential to Emit (tons/yr)
Hraymills Scrub Station	40	0.79	6.557	100%	262.28	0.13

#### Methodology

VOC (tons/yr) = usage (gal/yr)x density (g/cm3) \* 8.3 lb/gal per g/cm3 x 1 ton/2000 gal

## Appendix A: Emissions Calculations PM and VOC Emissions from Grain Handling Processes

Company Name: Bunge North America (East), Inc.

Source Address: 700 N. Rangeline Rd., Morristown, IN 46161 SSM and SPM No.: 145-36878-00035 and 145-36883-00035

Reviewer: Madhurima Moulik

Process / Units	Stack ID	Throughput		PM <sub>10</sub> EF		Control Efficiency	Potential to Emit PM	Potential to Emit PM	Potential to Emit PM <sub>10</sub>	Potential to Emit PM <sub>10</sub>	Potential to Emit VOC	Limited VOC	Limited VOC	Limited Hexane	PM after Controls	Controlled PTE PM	PM10 after Controls	Controlled PTE PM <sub>10</sub>
		(ton/hr)	(lb/ton)	(lb/ton)	(lb/ton)		(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(ton/yr)	(lb/ton)	(ton/yr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Truck Receiving Operations	Pt #1	648	0.071	0.021	-	95.34%	46.01	201.52	13.61	59.60	-		-	-	2.14	9.37	2.14	9.37
Rail Receiving & Conveying	Pt #1	400	0.032	0.0078	-	-	12.80	56.06	3.12	13.67	-		-	-	0.141	0.62	0.141	0.62
Milling Operations	Pt #4	99	0.36	0.500	-	-	35.64	156.10	49.50	216.81	-		-	-	1.3	5.69	1.3	5.69
A Flaking & Conveying	Pt #6	99	0.100	0.060	-	-	9.90	43.36	5.94	26.02	-		-	-	0.69	3.04	0.69	3.04
Flow coating material bin	Pt #11	30	1.400	0.400	-	-	42.00	183.96	12.00	52.56	-		-	-	0.026	0.11	0.026	0.11
Truck meal loadout operations	Pt #12	300	0.340	0.034	-	-	102.00	446.76	10.20	44.68	-		-		1.65	7.23	1.65	7.23
Rail meal loadout operations	Pt #13	300	0.061	0.034	-	-	18.30	80.15	10.20	44.68	-		-	-	0.1	0.44	0.1	0.44
A Extractor & Processing	Pt #9	46		-	4.900	95.00%	-	-	-	-	987.25	0.12	24.18	24.18	-	-	-	-
DTDC meal dryers (#1 & #2)	Pt #7	46	0.180	0.180	-	-	8.28	36.27	8.28	36.27	-	0.16	32.24		3.8	16.64	3.8	16.64
DTDC meal coolers (#1 & #2)	Pt #8	46	0.180	0.180	-	-	8.28	36.27	8.28	36.27	-	0.16	32.24		5.7	24.97	5.7	24.97
Vegetable oil refinery process (R-101 through R-106)	R-101 through R- 107	60	1.400	0.400	-	-	84.00	367.92	24.00	105.12	-	0.288	< 25.00	< 9.90 (1)	1.029	4.51	1.029	4.51
Pellet Mill Operations (EU #26)	Pt #26	18	0.152	0.076	-	-	2.73	239.00	1.36	119.50	-		-	-	2.74	12.00	1.37	6.00
Grain screening operations	Pt #5	724	0.071	0.021	-	-	51.40	225.15	15.20	66.59	-				1.52	6.66	1.52	6.66
Bean Heater (#16b)	Pt #25	128	0.073	0.073	-	-	9.34	40.93	9.34	40.93	-				0.62	2.72	0.62	2.72
B Hot Dehulling (#17b)	Pt #18	128	0.36	0.500	-	-	46.08	201.83	64.00	280.32	-				26.1	114.32	26.1	114.32
B Flaking (#27b)	Pt #19	128	0.270	0.068	-	-	34.56	151.37	8.64	37.84	-		-	-	0.69	3.02	0.69	3.02
B Meal Dryer #1 & #2 (#37b)	Pt #21	46	0.180	0.180	-	-	8.28	36.27	8.28	36.27	-	0.16	32.24	-	4.56	19.97	4.56	19.97
B Meal Cooler #3 (#38b)	Pt # 22	46	0.190	0.190	-	-	8.74	38.28	8.74	38.28	-	0.16	32.24	-	3.77	16.51	3.77	16.51
Meal Grinding (sizing) (#39b)	Pt #24	80	0.340	0.340	-	-	27.20	119.14	27.20	119.14	-		-	-	1.29	5.65	1.29	5.65
B Extractor & Processing (#32b, 33b, 34b, 35b)	Pt #23	46	-	-	4.900	95.00%	-	-	-	-	987.25	0.12	24.18	24.18	-	-	-	-
A column dryer	Pt #3	126	0.024	0.006	-	-	3.02	13.25	0.76	3.31	-		-	-	3.02	13.25	0.76	3.31
						Pot	ential to Emit:	2.673.58		1.377.84	1.974.50		202.30			266.72		250.78

#### Notes:

Assume PM2.5 = PM10

Potential Hexane and VOC emissions from the vegetable oil refinery process (R-101 through R-106) are reduced through condensers and mineral oil adsorption system. The permit contains conditions that require condensers and mineral oil adsorption system to operate while the vegetable oil refinery process is in operation.

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the VOC emissions from the vegetable oil refinery process (R-101 through R-106) shall not exceed 0.288 (lb/ton) and the total amount of off-site soybean oil processed shall not exceed 347,220,000 (lb/yr).

(1) In order to render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable, the Single HAP (n-Hexane) emissions for the vegetable oil refinery process (R-101 through R-106) shall not exceed 0.114 (lb/lon) and the total amount of off-site soybean oil processed shall not exceed 347,220,000 (lb/lyr).

#### Methodology:

 $\label{eq:uncontrolled PMPM-0(lb/hr) = Throughput (tor/hr) *EF (lb/ton)} Uncontrolled PM/PM-0(tor/hr) = Throughput (tor/hr) *EF (lb/ton) *8760 (hr/yr) *1 tor/2000lb Emission Factors from AP-42, Table 9.9.1-1 and Table 9.11.1-1$ 

VOC (Hexane) emissions from AP-42, Chapter 9.11.1.3 (SCC 3-02-019-98).

After control limits are calculated on the lb/hr limits established in the permit.

#### **TSD Appendix A: Emission Calculations Additional Information Summary**

Company Name: Bunge North America (East), Inc.

Source Address: 700 N. Rangeline Rd., Morristown, IN 46161 SSM and SPM No.: 145-36878-00035 and 145-36883-00035
Reviewer: Madhurima Moulik

					PM Em	issions	PM10 Er	nissions
S/V ID	Process Description	Control Description	CFM	gr/dscf	lbs/hr	tons/yr	lbs/hr	tons/yr
1	Grain receiving system, whole bean transfer, receiving and screening system	baghouse	50,000	0.005	2.14	9.39	2.14	9.39
2	Rail unloading	baghouse	3,300	0.005	0.141	0.62	0.141	0.62
5	Grain screening Operations	baghouse	35,500	0.005	1.52	6.66	1.52	6.66
4	Milling Operations	baghouse	25,400	0.006	1.31	5.72	1.31	5.72
6	Flaking Mill Operations	baghouse	16,200	0.005	0.69	3.04	0.69	3.04
11	Flow Coating Bin	baghouse	600	0.005	0.026	0.11	0.026	0.11
12	Truck Meal Loadout Operations	baghouse	38,500	0.005	1.65	7.23	1.65	7.23
13	Rail Meal Loadout Operations	baghouse	2,000	0.006	0.10	0.45	0.10	0.45
7	DTDC Meal Dryers, #1 and #2	cyclone	22,000	0.02	3.77	16.52	3.77	16.52
8	DTDC Meal Coolers, #1 and #2	cyclone	22,000	0.03	5.66	24.78	5.66	24.78
R-101	Storage Silo	integral baghouse	3,000	0.01	0.257	1.13	0.257	1.13
R-102	Surge Tank	integral baghouse	1,000	0.01	0.086	0.38	0.086	0.38
R-103	Storage Silo	integral baghouse	3,000	0.01	0.257	1.13	0.257	1.13
R-104	Surge Tank	integral baghouse	1,000	0.01	0.086	0.38	0.086	0.38
R-105	Storage Silo	integral baghouse	3,000	0.01	0.257	1.13	0.257	1.13
R-106	Surge Tank	integral baghouse	1,000	0.01	0.086	0.38	0.086	0.38
26	Pellet Mill Operations	baghouse	7,500	0.01	2.74	12.00	1.37	6.00
25	Bean Heater	baghouse /cyclone	18,000	0.004	0.62	2.70	0.62	2.70
18	B Hot Dehulling	4 cyclones	121,800	0.025	26.10	114.32	26.10	114.32
19	B Flaking	baghouse	16,000	0.005	0.69	3.00	0.69	3.00
21	DTDC Meal Dryers, #1 and #2 (Plant B)	cyclone	38,000	0.014	4.56	19.97	4.56	19.97
22	DTDC Meal Coolers, #1 and #2 (Plant B)	cyclone	22,000	0.02	3.77	16.52	3.77	16.52
24	Meal Grinding Pt	baghouse	30,000	0.005	1.29	5.63	1.29	5.63
				Total		253.17		247.17

#### Appendix A: Emissions Calculations

Company Name: Bunge North America (East), Inc.

Source Address: 700 N. Rangeline Rd., Morristown, IN 46161 SSM and SPM No.: 145-36878-00035 and 145-36883-00035

**Reviewer: Madhurima Moulik** 

Calculation from Permit No. T45-21512-00035

FM = adjustment for foreign matter  $H_2O =$  adjustment for moisture

803,000 ton processed *	1.007 (FM) *	$1.025 (H_20) =$	828,836.5 ton received
yr			yr
1,065,538 ton processed * yr	1.007 (FM) *	1.000151 (H <sub>2</sub> 0) =	1,073,158.8 ton received yr
		Total for Both Plants =	1,901,995.3 ton received

The following calculations determine PM emissions from existing limits in Permit No. T145-21512-00035

803000 ton grain *	0.12 lb VOC *	ton VOC	=	48.18 ton VOC
yr	ton grain	2000 lb VOC	_	yr
803000 ton grain * yr	0.16 lb VOC * ton grain	ton VOC 2000 lb VOC	_ =	64.24 <u>ton VOC</u> yr
803000 ton grain * yr	0.16 lb VOC * ton grain	ton VOC 2000 lb VOC	_ =	64.24 <u>ton VOC</u> yr
			Total =	176.66
803000 ton grain *	1.2 lb VOC *	ton VOC	=	481.8 ton VOC
vr	ton grain	2000 lb VOC		vr

The following calculations determine adjustments to limits in Permit No. T145-21512-00035

-	803000 ton process 828837 ton received		=	0.968827405 (ratio)
0.12 lb VOC * ton processed	0.968827 =	0.116259 lb \ton	VOC n received	
0.16 lb VOC * ton processed	0.968827 =	0.155012 lb \ton	VOC n received	
0.16 lb VOC * ton processed	0.968827 =	0.155012 lb \ton	VOC n received	
1.2 lb VOC * ton processed	0.968827 =	1.162593 <u>lb \</u> ton	VOC n received	

## Appendix A: Emissions Calculations Natural Gas, Vegetable Oil, and No. 2 Fuel Oil Combustion Emissions

Company Name: Bunge North America (East), Inc.

Source Address: 700 N. Rangeline Rd., Morristown, IN 46161 SSM and SPM No.: 145-36878-00035 and 145-36883-00035

Reviewer: Madhurima Moulik

#### **Uncontrolled Potentials to Emit**

		Rated			Er	nission Fact	ors					E	Emissions			
		Capacity	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	SO <sub>2</sub>	СО	VOC	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>X</sub>	SO <sub>2</sub>	СО	VOC
Unit ID	Description	(MMBtu/hr)	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)
	Murray Boiler NG	96	0.0019	0.0075	0.0075	0.0980	0.0006	0.0824	0.0054	0.78	3.13	3.13	41.22	0.25	34.63	2.27
Murray Boiler	Murray Boiler Vegetable Oil	96	0.0160	0.0160	0.0160	0.1463	0.0167	0.0003	0.0024	6.73	6.73	6.73	61.52	7.02	0.13	1.01
(Boiler No. 1)	Murray Boiler Distillate	96	0.0143	0.0164	0.0111	0.1429	0.5071	0.03571	0.0014	6.01	6.91	4.66	60.07	213.24	15.02	0.60
							Wors	t Case Poter	ntial to Emit	6.73	6.91	6.73	61.52	213.24	34.63	2.27
	Boiler No.2 NG	240	0.0019	0.0075	0.0075	0.0980	0.0006	0.0824	0.0054	1.96	7.83	7.83	103.06	0.62	86.57	5.67
Boiler No. 2	Boiler No.2 Vegetable Oil	240	0.0160	0.0160	0.0160	0.1463	0.0167	0.0003	0.0024	16.82	16.82	16.82	153.79	17.56	0.32	2.52
Bollet No. 2	Boiler No.2 Distillate	240	0.0143	0.0164	0.0111	0.0714	0.5071	0.03571	0.0014	15.02	17.27	11.64	75.09	533.11	37.54	1.50
							Wors	t Case Poter	ntial to Emit	16.82	17.27	16.82	153.79	533.11	86.57	5.67
R-107	Refinery Boiler NG	13	0.0019	0.0075	0.0075	0.0980	0.0006	0.0824	0.0054	0.11	0.42	0.42	5.58	0.03	4.69	0.31
K-107			Potential to Emit 0.11 0.42 0.42 5.58 0.03 4.69 0.31							0.31						
		1														
Column Dryer	Column Dryer (Natural Gas)	20	0.0019	0.0075	0.0075	0.0980	0.0006	0.0824	0.0054	0.16	0.65	0.65	8.59	0.05	7.21	0.47
Coldinii Diyel		•	•			•	•	Pote	ntial to Emit	0.16	0.65	0.65	8.59	0.05	7.21	0.47

#### Notes

PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

Assuming PM2.5 = PM10 when an emission factor was not provided for PM2.5

Emission Factors for NOx: for Natural Gas combustion of Boiler No. 2; Flue gas recirculation = 100 lb/MMcf (See AP 42, Chapter 1.4, Table 1.4-1)

Natural Gas has a heating value of 1,020 MMBtu/MMcf

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Natural Gas Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Fuel Oil Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, 1.3-3, and 1.3-6 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file). To convert from lb/kgal to lb/MMBtu, divide by 140.

Vegetable Oil emission factors for PM, NOx, VOC, SO2, and CO are based on emission tests conducted February 12, 2001 and July 19, 2001 on the Boiler B010 stack at the Central Soya facility in Bellevue, OH. These tests were supervised by the Ohio EPA.

The source assumes no HAPs emissions from Vegetable Oil Combustion.

#### Methodology

Potential Emissions (tons/year) = Rated Capacity (MMBtu/hr) \* Emission Factor (lb/MMBtu) \* 8,760 (hrs/yr) / 2,000 (lb/ton)

## Appendix A: Emissions Calculations Natural Gas, Vegetable Oil, and No. 2 Fuel Oil Combustion Emissions

Company Name: Bunge North America (East), Inc.

Source Address: 700 N. Rangeline Rd., Morristown, IN 46161 SSM and SPM No.: 145-36878-00035 and 145-36883-00035

Reviewer: Madhurima Moulik

#### **Limited Potentials to Emit**

		Rated		Emission Factors						E	Emissions					
		Capacity	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	SO <sub>2</sub>	co	VOC	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	SO <sub>2</sub>	co	VOC
Unit ID	Description	(MMBtu/hr)	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)
	Murray Boiler NG	96	0.0019	0.0075	0.0075	0.0980	0.0006	0.0824	0.0054	0.78	3.13	3.13	41.22	0.25	34.63	2.27
Murray Boiler	Murray Boiler Vegetable Oil	96	0.0160	0.0160	0.0160	0.1463	0.0167	0.0003	0.0024	6.73	6.73	6.73	61.52	7.02	0.13	1.01
(Boiler No. 1)	Murray Boiler Distillate	96	0.0143	0.0164	0.0111	0.1429	0.0507	0.03571	0.0014	6.01	6.91	4.66	60.07	21.32	15.02	0.60
							Wor	st Case Pote	ntial to Emit	6.73	6.91	6.73	61.52	21.32	34.63	2.27
	Boiler No.2 NG	240	0.0019	0.0075	0.0075	0.0980	0.0006	0.0824	0.0054	1.96	7.83	7.83	103.06	0.62	86.57	5.67
Boiler No. 2	Boiler No.2 Vegetable Oil	240	0.0160	0.0160	0.0160	0.1463	0.0167	0.0003	0.0024	16.82	4.72	16.82	153.79	17.56	0.32	2.52
Boilet No. 2	Boiler No.2 Distillate	240	0.0143	0.0164	0.0111	0.0500	0.0507	0.03571	0.0014	15.02	10.50	11.64	52.56	22.52	37.54	1.50
							Wor	st Case Pote	ntial to Emit	16.82	10.50	16.82	153.79	22.52	86.57	5.67
R-107	Refinery Boiler NG	13	0.0019	0.0075	0.0075	0.0980	0.0006	0.0824	0.0054	0.11	0.42	0.42	5.58	0.03	4.69	0.31
11-107								Pote	ntial to Emit	0.11	0.42	0.42	5.58	0.03	4.69	0.31
Column Dryer	Column Dryer (Natural Gas)	20	0.0019	0.0075	0.0075	0.0980	0.0006	0.0824	0.0054	0.16	0.65	0.65	8.59	0.05	7.21	0.47
Coldilli Diyel								Pote	ntial to Emit	0.16	0.65	0.65	8.59	0.05	7.21	0.47

#### Notes

PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

Assuming PM2.5 = PM10 when an emission factor was not provided for PM2.5

Unlimited Emission Factors for NOx: for Natural Gas combustion of Boiler No. 2; Flue gas recirculation = 100 lb/MMcf (See AP 42, Chapter 1.4, Table 1.4-1)

Limited Emission Factor for NOx for Boiler No. 2 (0.05 lb/MMBtu) from the Consent Decree entered on January 16, 2007, in Civil Action No. 2:06-CV-02209,

Limited SO2 emissions for Murray Boiler and Boiler No. 2 based on limited sulfur content (0.05% by weight) pursuant to Consent Decree entered on January 16, 2007, in Civil Action No. 2:06-CV-02209.

Limited PM10 emissions for Boiler No. 2 (Vegetable Oil Combustion) from Conditions D.7.1(d) (4,540,000 gallons/yr) and (e) (0.016 lb/MMBtu).

Natural Gas has a heating value of 1,020 MMBtu/MMcf 1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

To convert from Ib/kgal to Ib/MMBtu. divide by 140.

Natural Gas Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Fuel Oil Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, 1.3-3, and 1.3-6 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file).

Vegetable Oil emission factors for PM, NOx, VOC, SO2, and CO are based on emission tests conducted February 12, 2001 and July 19, 2001 on the Boiler B010 stack at the Central Soya facility in Bellevue, OH. These tests were supervised by the Ohio EPA. The source assumes no HAPs emissions from Vegetable Oil Combustion.

#### Methodology

Potential Emissions (tons/year) = Rated Capacity (MMBtu/hr) \* Emission Factor (lb/MMBtu) \* 8,760 (hrs/yr) / 2,000 (lb/ton)

Boiler No. 2 Potential SO<sub>2</sub> Emissions (tons/year) = Limited No. 2 Fuel Oil (6,343,949 gallons) \* 1 kgal/1000 gal \* Emission Factor (lb/kgal) \* 1 ton / 2,000 lb.

SO<sub>2</sub> lb/kgal emission factor based on AP-42 Chapter 1.3, Table 1.3-1 (SCC 1-01-005-01, 1-02-005-01, 1-03-005-01) and limited sulfur content (0.05% by weight) pursuant to Consent Decree entered on January 16, 2007, in Civil Action No. 2:06-CV-02209. No. 2 Fuel Oil Limit (6.343,949 gallons) from permit Condition D.7.1(c).

Boiler No.2 Potential PM10 Emissions (tons/yr) from Vegetable Oil = Limited Vegetable Oil Usage (4,540,000 gallons/yr) \* 130064 Btu/Gal \* (1 MMBtu /1000000 Btu) \*0.016 lb/MMBtu \* (1 ton / 2,000 lb) Boiler No. 2 Potential PM10 Emissions (tons/yr) from No. 2 fuel oil = 10.5 (from Condition D.7.1(b))

171.8

#### Appendix A: Emissions Calculations **Natural Gas Combustion Only** MM BTU/HR <100

Company Name: Bunge North America (East), Inc.

Source Address: 700 N. Rangeline Rd., Morristown, IN 46161 M and SPM No.: 145-36878-00035 and 145-36883-00035 SSM and SPM No.:

20.0

Reviewer: Madhurima Moulik

			HHV	
	<b>Heat Input Capacity</b>	•	mmBtu	Potential Throughput
	MMBtu/hr		mmscf	MMCF/yr
Refinery Boiler (R-107)	13.0		1020	111.6

1020

#### Hazardous Air Pollutants (HAPs)

		HAPs - Organics										
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics						
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03							
Potential Emission in tons/yr (R-107)	1.2E-04	6.7E-05	4.2E-03	0.10	1.9E-04	0.11						
Potential Emission in tons/yr (Pt #3)	1.8E-04	1.0E-04	6.4E-03	0.15	2.9E-04	0.16						

		HAPs - Metals									
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals					
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03						
Potential Emission in tons/yr (R-107)	2.8E-05	6.1E-05	7.8E-05	2.1E-05	1.2E-04	3.1E-04					
Potential Emission in tons/yr (Pt #3)	4.3E-05	9.4E-05	1.2E-04	3.3E-05	1.8E-04	4.7E-04					
Methodology				R-107	Total HAPs	0.11					
The five highest organic and metal HAPs	emission factors	s are provided abov	e.	R-107	Worst HAP	0.10					
Additional HAPs emission factors are ava	Pt #3	Total HAPs	0.16								
All emission factors are based on normal	firing			Pt #3	Worst HAP	0.15					

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Column Dryer (Pt #3)

#### Appendix A: Emissions Calculations **Murray Boiler HAP Emissions** from Natural Gas Combustion

Company Name: Bunge North America (East), Inc.

Source Address: 700 N. Rangeline Rd., Morristown, IN 46161 145-36878-00035 and 145-36883-00035 SSM and SPM No.:

Reviewer: Madhurima Moulik

HHV

**Heat Input Capacity** MMBtu/hr (Murray boiler) 96.0

mmBtu mmscf 1020

Potential Throughput MMCF/yr 824.5

#### Hazardous Air Pollutants (HAPs)

		HAPs - Organics									
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics					
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03						
Potential Emission in tons/yr	8.7E-04	4.9E-04	3.1E-02	0.74	1.4E-03	0.78					

		HAPs - Metals							
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals			
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03				
Potential Emission in tons/yr	2.1E-04	4.5E-04	5.8E-04	1.6E-04	8.7E-04	2.3E-03			
Methodology	Total HAPs	0.78							
The five highest organic and metal HAPs	Worst HAP	0.74							

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

#### Appendix A: Emission Calculations **Boiler No. 2 HAP Emissions** from Natural Gas Combustion

Company Name: Bunge North America (East), Inc.
Source Address: 700 N. Rangeline Rd., Morristown, IN 46161 145-36878-00035 and 145-36883-00035 SSM and SPM No.:

Reviewer: Madhurima Moulik

HHV

**Heat Input Capacity** mmBtu MMBtu/hr mmscf 240.0 1020 (Boiler No. 2)

Potential Throughput MMCF/yr 2061.2

#### Hazardous Air Pollutants (HAPs)

	HAPs - Organics							
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene			
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03			
Potential Emission in tons/yr	2.16E-03	1.24E-03	7.73E-02	1.86	3.50E-03			

		ŀ					
	Lead	Cadmium	Chromium	Manganese	Nickel	Worst HAP	Total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	Hexane	
Potential Emission in tons/yr	5.15E-04	1.13E-03	1.44E-03	3.92E-04	2.16E-03	1.86	1.94

#### Methodology

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04 (AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

#### Appendix A: Emissions Calculations Murray Boiler HAP Emissions from #2 Fuel Oil Combustion

Company Name: Bunge North America (East), Inc.

Source Address: 700 N. Rangeline Rd., Morristown, IN 46161 SSM and SPM No.: 145-36878-00035 and 145-36883-00035

Reviewer: Madhurima Moulik

Heat Input Capacity Potential Throughput kgals/year 96 6006.9

#### **Hazardous Air Pollutants (HAPs)**

	HAPs - Metals						
	Arsenic	Beryllium	Cadmium	Chromium	Lead		
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06		
Potential Emission in tons/yr	1.7E-03	1.3E-03	1.3E-03	1.3E-03	3.8E-03		

		HAPs - Meta				
	Mercury	Manganese	Nickel	Selenium	Total	Worst
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05	2.1E-02	6.3E-03
Potential Emission in tons/yr	1.3E-03	2.5E-03	1.3E-03	6.3E-03		Selenium

#### Methodology

No data was available in AP-42 for organic HAPs.

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file) Potential Emissions (tons/year) = Throughput (mmBtu/hr)\*Emission Factor (lb/mmBtu)\*8,760 hrs/yr / 2,000 lb/ton

#### Appendix A: Emissions Calculations Boiler No. 2 HAP Emissions from #2 Fuel Oil Combustion

Company Name: Bunge North America (East), Inc.

Address, City IN Zip: 700 N. Rangeline Rd., Morristown, IN 46161 SSM and SPM No.: 145-36878-00035 and 145-36883-00035

Reviewer: Madhurima Moulik

Heat Input Capacity MMBtu/hr Potential Throughput kgals/year

240 (Boiler No. 2) 15017.14286

	HAPs - Metals							
	Arsenic	Beryllium	Cadmium	Chromium	Lead			
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06			
Potential Emission in tons/yr	4.20E-03	3.15E-03	3.15E-03	3.15E-03	9.46E-03			

		HAPs - Metals				
	Mercury	Manganese	Nickel	Selenium	Worst HAP	Total HAPs
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05	Selenium	
Potential Emission in tons/yr	3.15E-03	6.31E-03	3.15E-03	1.58E-02	1.58E-02	5.15E-02

#### Methodology

No data was available in AP-42 for organic HAPs.

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, 1.3-3, and 1.3-6 (SCC 1-02-005-01/02/03) Supplement E 9/98

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Emissions (tons/year) = Throughput (mmBtu/hr)\*Emission Factor (lb/mmBtu)\*8,760 hrs/yr / 2,000 lb/ton

#### Appendix A: Emission Calculations Fugitive Dust Emissions - Paved Roads

Company Name: Bunge North America (East), Inc. Source Address: 700 N. Rangeline Rd., Morristown, IN 46161 SSM and SPM No.: 145-36878-00035 and 145-36883-00035 Reviewer: Madhurima Moulik

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

	Maximum	Number of one-		Maximum					
	number of	way trips per	Maximum trips	Weight	Total Weight	Maximum one-	Maximum one-	Maximum one-	Maximum one-
	vehicles per	day per	per day	Loaded	driven per day	way distance	way distance	way miles	way miles
Type	day	vehicle	(trip/day)	(tons/trip)	(ton/day)	(feet/trip)	(mi/trip)	(miles/day)	(miles/yr)
Vehicle (entering plant) (one-way trip) - Full	1.0	371.52	371.5	40.0	14860.8	2698	0.511	189.8	69294.1
Vehicle (leaving plant) (one-way trip) - Empty	1.0	371.52	371.5	12.0	4458.2	2698	0.511	189.8	69294.1
		Totals	743.0		19319.0			379.7	138588.1

Average Vehicle Weight Per Trip = 26.0 tons/trip
Average Miles Per Trip = 0.51 miles/trip miles/trip

Unmitigated Emission Factor, Ef = [k \* (sL)^0.91 \* (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	26.0	26.0	26.0	tons = average vehicle weight (provided by source)
sL =	1.2	1.2	1.2	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E \* [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext =  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor, Eext =  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) where p =  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{125}$  (Equation 2 from Mitigated Emission Factor) and  $\frac{\text{Ef * [1 - (p/4N)]}}{12$ 

PM PM10 PM2.5 Unmitigated Emission Factor, Ef = Mitigated Emission Factor, Eext = 0.360

	Unmitigated	Unmitigated	Unmitigated	Mitigated	Mitigated PTE	Mitigated PTE of
	PTE of PM		PTE of PM2.5	PTE of PM	of PM10	PM2.5
Process	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Vehicle (entering plant) (one-way trip) - Full	12.48	2.50	0.61	11.42	2.28	0.56
Vehicle (leaving plant) (one-way trip) - Empty	12.48	2.50	0.61	11.42	2.28	0.56
Totals	24.97	4.99	1.23	22.83	4.57	1.12

#### Methodology

Controlled PTF (tons/vr)

Total Weight driven per day (ton/day) Maximum one-way distance (mi/trip) Maximum one-way miles (miles/day) Average Vehicle Weight Per Trip (ton/trip)
Average Miles Per Trip (miles/trip) Unmitigated PTE (tons/yr) Mitigated PTE (tons/yr)

= [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]

= [Maximum one-way distance (feet/frip) / [5280 ft/mile] = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]

= [Maximum trips per year (trip/day)] \*[Maximum one-way distance (mrtrp)] = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)] = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)] = [Maximum one-way miles (milesyt)] \* [Miligated Emission Factor (lb/mile)] \* (ton/2000 lbs) = [Maximum one-way miles (milesyt)] \* [Miligated Emission Factor (lb/mile)] \* (ton/2000 lbs) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

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

## Appendix A: Emission Calculations 326 IAC 6-3-2, Particulate Emission Limitations

Company Name: Bunge North America (East), Inc.

Source Address: 700 N. Rangeline Rd., Morristown, IN 46161 SSM and SPM No.: 145-36878-00035 and 145-36883-00035

Reviewer: Madhurima Moulik

Process Description	Process Weight Rate	Process Weight Rate	326 IAC 6-3-2 Limit	Uncontrolled PM Emissions	Controlled PM Emissions	Capable of Compliance with
Process Description	(ton/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	326 IAC 6-3-2
Truck Receiving Operations	648.00	1,296,000	72.11	46.01	2.14	Yes
Rail Receiving & Conveying	400.00	800,000	66.31	12.80	0.14	Yes
Milling Operations	99.00	198,000	51.18	35.64	1.30	Yes
A Flaking & Conveying	99.00	198,000	51.18	9.90	0.69	Yes
Flow coating material bin	30.00	60,000	40.04	42.00	0.03	Yes, with Control
Truck meal loadout operations	300.00	600,000	63.00	102.00	1.65	Yes, with Control
Rail meal loadout operations	300.00	600,000	63.00	18.30	0.10	Yes
DTDC meal dryers (#1 & #2)	46.00	92,000	43.80	8.28	3.80	Yes
DTDC meal coolers (#1 & #2)	46.00	92,000	43.80	8.28	5.70	Yes
Vegetable oil refinery process (R-101 through R-106)	60.00	120,000	46.29	84.00	1.03	Yes, with Control
Pellet Mill Operations (EU #26)	18.00	36,000	28.43	2.73	2.74	Yes
Grain screening operations	724.00	1,448,000	73.48	51.40	1.52	Yes
Bean Heater (#16b)	128.00	256,000	53.79	9.34	0.62	Yes
B Hot Dehulling (#17b)	128.00	256,000	53.79	46.08	26.10	Yes
B Flaking (#27b)	128.00	256,000	53.79	34.56	0.69	Yes
B Meal Dryer #1 & #2 (#37b)	46.00	92,000	43.80	8.28	4.56	Yes
B Meal Cooler #3 (#38b)	46.00	92,000	43.80	8.74	3.77	Yes
Meal Grinding (sizing) (#39b)	80.00	160,000	49.06	27.20	1.29	Yes
A column dryer	126.00	252,000	53.63	3.02	3.02	Yes

#### **Emission Limit Calculation Notes:**

When the process weight rate is less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths (0.551) pound per hour.

Emission limitations for process weight rates up to sixty thousand pounds per hour shall be calculated with the following equation:

 $E (lb/hr) = 4.10 P^{0.67}$ 

Emission limitations for process weight rates greater than sixty thousand pounds per hour shall be calculated with the following equation:

E (lb/hr) =  $55.0 P^{0.11} - 40$ 

Where: E = Rate of emission in pounds per hour

P = Process Weight Rate in tons per hour



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 18, 2016

Ms. Maranda Mullis Bunge North America (East), LLC 700 N. Rangeline Road Morristown, Indiana 46161-0860

Re: Public Notice

Bunge North America (East), LLC

Permit Level: Significant Source Modification

Permit Number: 145-36878-00035

Permit Level: Significant Permit Modification

Permit Number: 145-36883-00035

Dear Ms. Mullis:

Enclosed is a copy of your draft Significant Source Modification and Significant Permit Modification, Technical Support Documents, 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 Shelbyville News in Shelbyville, Indiana publish the abbreviated version of the public notice no later than August 19, 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 Shelby County Public Library, 57 West Broadway in Shelbyville, 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 Madhurima Moulik, 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 3-0868 or dial (317) 233-0868.

Sincerely,

Víckí Bíddle

Vicki Biddle Permits Branch Office of Air Quality

Enclosures PN Applicant Cover letter 2/17/2016







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Michael R. Pence Governor

Carol S. Comer Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 17, 2016

The Shelbyville News 123 E. Washington Street Shelbyville, Indiana 46176

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Bunge North America (East), Inc., Shelby 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 19, 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,

Víckí Bíddle

Vicki Biddle Permit Branch Office of Air Quality

Permit Level: Significant Source Modification --- Permit Number: 145-36878-00035 Permit Level: Significant Permit Modification ---- Permit Number: 145-36883-00035

Enclosure

PN Newspaper.dot 2/17/2016







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Michael R. Pence Governor Carol S. Comer Commissioner

August 18, 2016

To: Shelby County Public Library

From: Matthew Stuckey, Branch Chief

Permits Branch Office of Air Quality

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

Permit

Applicant Name: Bunge North America (East), Inc.

Permit Number: 145-36878-00035 and 145-36883-00035

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







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

Carol S. Comer Commissioner

#### **Notice of Public Comment**

August 18, 2016 Bunge North America (East), Inc. 145-36878-00035 & 145-36883-00035

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







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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

## AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

August 18, 2016

A 30-day public comment period has been initiated for:

Permit Number: 145-36878-00035 and 145-36883-00035
Applicant Name: Bunge North America (East), Inc.
Location: Shelbyville, Shelby County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at: http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management Office of Air Quality, Permits Branch 100 North Senate Avenue Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at <a href="mailto:chammack@idem.IN.gov">chammack@idem.IN.gov</a> or (317) 233-2414.

Affected States Notification.dot 2/17/2016





## Mail Code 61-53

IDEM Staff	VBIDDLE 8/18/2	2016	145-36878-00035	DRAFT &	
	Bunge North Am	erica (East), LLC	145-36883-00035	DRAFT	AFFIX STAMP
Name and		Indiana Departme	nt of Environmental	Type of Mail:	HERE IF
address of		Management			USED AS
Sender		Office of Air Qualit	ty – Permits Branch	CERTIFICATE OF	CERTIFICATE
		100 N. Senate		MAILING ONLY	OF MAILING
		Indianapolis, IN 46	6204		

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		Maranda Mullis Bunge North America (East), LLC 700 N Rangeline Road Morristown II	N 46161-086	0 (Source CAA	ATS)						
2		Brad Sommer Facility Manager Bunge North America (East), LLC 700 N Rangeline Road Morristown IN 46161-0860 (RO CAATS)									
3		Mr. Daniel Evans 45 Carriage Lake Dr. Brownsburg IN 46112 (Affected Party)									
4		Mr. John Evans 316 2nd Street Huntington Beach CA 92648 (Affected Party)									
5		Mr. Hugh Garner 10203 S Degelow Road Milroy IN 46156 (Affected Party)									
6		Michael & Pamela Bassett 4738 East 1100 North Morristown IN 46161 (Affected Party)									
7		Christopher, Brandon, Kim & Sarah Everhart 10493 N 800 E Arlington IN 46404-9602 (Affected Party)									
8		Ms. Lisa Fox 6820 East 600 South Morristown IN 46161 (Affected Party)									
9		Mr. Kent Gordon 662 South Wash R 1 Morristown IN 46161 (Affected Party)									
10		Ms. Nikki Griffin 4698 East 1100 North Morristown IN 46161 (Affected Party)									
11		Ms. Kathy Hannemann 7004 East 600 South Morristown IN 46161 (Affected Party)									
12		Gary & Mary Harris 6488 East 600 South Morristown IN 46161 (Affected Party)									
13		Robert & Margaret Halvin 6290 East 600 South Morristown IN 46161 (Affected Party)									
14		Sandra & Ray Heck PO Box 163 Morristown IN 46161 (Affected Party)									
15		Ms. Norma Kraft 9266 North Blue River Road Morristown IN 46161 (Affected Party)									

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

Pg. 1 of 3

## Mail Code 61-53

IDEM Staff	VBIDDLE 8/18/2	016	145-36878-00035	DRAFT &	
	Bunge North Ame	erica (East), LLC	145-36883-00035	DRAFT	AFFIX STAMP
Name and		Indiana Department	of Environmental	Type of Mail:	HERE IF
address of		Management			USED AS
Sender		Office of Air Quality	<ul> <li>Permits Branch</li> </ul>	CERTIFICATE OF	CERTIFICATE
		100 N. Senate		MAILING ONLY	OF MAILING
		Indianapolis, IN 462	04	MAIENTO ONET	

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		Frances & Katrina PO Box 474 Morristown IN 46161 (Affected Party)									
2		Connie Scott 4359 Est 1100 North Morristown IN 46161 (Affected Party)									
3		Ms. Shirley Shepherdson 8849 North Blue River Road Morristown IN 46161 (Affected Party)									
4		Merrill & Donna Storm 11317 North 500 East Morristown IN 46161 (Affected Party)									
5		Ms. Betty Tribby PO Box 174 Morristown IN 46161 (Affected Party)									
6		Morristown Town Council and Town Manager P.O. Box 389 Morristown IN 46161 (Local Official)									
7		Heather & Sean Christopher 4385 West Woodbridge Lane New Palestine IN 46163-9487 (Affected Party)									
8		Mr. Quin McLoughlin 12450 Curry Court Saratoga CA 95070 (Affected Party)									
9		Dennis & Rita Corn 341 East 5th Street Rushville IN 46173 (Affected Party)									
10		Shelbyville City Council and Mayors Office 44 West Washington Shelbyville IN 4617	6 (Local Offic	cial)							
11		Shelby County Commissioners 25 West Polk Shelbyville IN 46176 (Local Official)									
12		Shelbyville Shelby Co Public Library 57 W Broadway Shelbyville IN 46176-1294 (Library)									
13		Larry & Patricia Cassidy 7066 East Union Road Shelbyville IN 46176-9109 (Affected Party)									
14		Ronald & Marianne Smalley 5433 East 1200 North Morristown IN 46161 (Affected Party)									
15		Shelby County Health Department 1600 E. SR 44B Shelbyville IN 46176 (Health De	epartment)								

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

Pg. 2 of 3

## Mail Code 61-53

IDEM Staff	VBIDDLE 8/18/2	2016	145-36878-00035	DRAFT	
	Bunge North Am	erica (East), LLC	145-36883-00035	DRAFT	AFFIX STAMP
Name and		Indiana Departme	ent of Environmental	Type of Mail:	HERE IF
address of		Management			USED AS
Sender		Office of Air Quali	ity – Permits Branch	CERTIFICATE OF	CERTIFICATE
		100 N. Senate		MAILING ONLY	OF MAILING
		Indianapolis, IN 4	6204		

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		Shelby County Council 25 W. Polk Street Shelbyville In 46176 (Affected Party)									
2		Jerri Thibaut Bunge North America, Inc. 11720 Borman Drive St. Louis MO 63146	(Source – addi	contact)							
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											
13											
14											
15											

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

Pg. 3 of 3