



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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(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
MSOP Transitioning to a FESOP

FESOP No. F147-36979-00055

The Indiana Department of Environmental Management (IDEM) has received an application from ADM Grain Company, located at 609 N State Road 66, Rockport, IN 47635, for a MSOP transitioning to a FESOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow ADM Grain Company to continue operating its stationary country grain elevator.

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

Spencer County Public Library
210 Walnut Street
Rockport, Indiana 47635
and

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

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

How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F147-36979-00055 in all correspondence.

Comments should be sent to:

Aida DeGuzman
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-4972
Or dial directly: (317) 233-4972
Fax: (317) 232-6749 attn: Aida DeGuzman
E-mail: adeguzma@idem.IN.gov

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

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

What will happen after IDEM makes a decision?

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

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



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



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Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**ADM Grain Company
609 North State Road 66
Rockport, Indiana 47635**

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

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

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

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

Operation Permit No.: F147-36979-00055	
Issued by:	Issuance Date:
Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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TABLE OF CONTENTS

TABLE OF CONTENTS	2
SECTION A SOURCE SUMMARY	4
A.1 General Information [326 IAC 2-8-3(b)]	4
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)].....	4
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]	7
A.4 FESOP Applicability [326 IAC 2-8-2]	7
SECTION B GENERAL CONDITIONS.....	8
B.1 Definitions [326 IAC 2-8-1].....	8
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	8
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	8
B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12].....	8
B.5 Severability [326 IAC 2-8-4(4)].....	8
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)].....	8
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)].....	8
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	8
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	9
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	10
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)].....	10
B.12 Emergency Provisions [326 IAC 2-8-12].....	10
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	12
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)].....	12
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8].....	13
B.16 Permit Renewal [326 IAC 2-8-3(h)].....	13
B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	14
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1].....	14
B.19 Source Modification Requirement [326 IAC 2-8-11.1]	15
B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]....	15
B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	16
B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]	16
B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6].....	16
SECTION C SOURCE OPERATION CONDITIONS.....	17
Emission Limitations and Standards [326 IAC 2-8-4(1)]	17
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2].....	17
C.2 Overall Source Limit [326 IAC 2-8]	17
C.3 Opacity [326 IAC 5-1].....	17
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	18
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2].....	18
C.6 Fugitive Dust Emissions [326 IAC 6-4]	18
C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5].....	18
C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M] ...	18
Testing Requirements [326 IAC 2-8-4(3)].....	19
C.9 Performance Testing [326 IAC 3-6]	19
Compliance Requirements [326 IAC 2-1.1-11]	20
C.10 Compliance Requirements [326 IAC 2-1.1-11]	20
Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]	20
C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)].....	20

DRAFT

C.12	Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]	20
Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]		20
C.13	Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]	20
C.14	Risk Management Plan [326 IAC 2-8-4] [40 CFR 68].....	21
C.15	Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]	21
C.16	Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]	22
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]		22
C.17	General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]	22
C.18	General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11].....	23
Stratospheric Ozone Protection		23
C.19	Compliance with 40 CFR 82 and 326 IAC 22-1	23
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS		24
Emission Limitations and Standards [326 IAC 2-8-4(1)]		27
D.1.1	Prevention of Significant deterioration (PSD) Minor Limits [326 IAC 2-2]	27
D.1.2	FESOP Limits [326 IAC 2-8]	27
D.1.3	Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]	28
D.1.4	Preventive Maintenance Plan [326 IAC 1-6-3].....	29
Compliance Determination Requirements [326 IAC 2-8-4(1)].....		29
D.1.5	Particulate Control [326 IAC 2 8 4(1)].....	29
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]		30
D.1.6	Recordkeeping Requirements [326 IAC 2 8 4(3)].....	30
D.1.7	Reporting Requirements [326 IAC 2 8 4(3)]	30
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT		31
CERTIFICATION		31
EMERGENCY OCCURRENCE REPORT		32
FESOP Quarterly Report		34
FESOP Quarterly Report		35
FESOP Quarterly Report		36
FESOP Quarterly Report		37
FESOP Quarterly Report		38
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT		39

Attachment A - Fugitive Dust Control Plan (FDCP)

DRAFT
SOURCE SUMMARY

SECTION A

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

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

The Permittee owns and operates a stationary country grain elevator.

Source Address:	609 North State Road 66, Rockport, IN 47635, Indiana
General Source Phone Number:	(217) 424-5200
SIC Code:	5153
County Location:	Spencer
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) truck receiving operation, identified as EP-1, consisting of the following equipment:
- (1) One (1) receiving pit, identified as Dump #1, constructed in 2002, with maximum throughput rate of 18,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (2) One (1) receiving pit, identified as River Dump #2, constructed in 2002, approved in 2016 to increase maximum throughput rate from 30,000 to 45,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (3) One (1) receiving pit, identified as River Dump #3, constructed in 2002, approved in 2016 to increase maximum throughput rate from 30,000 to 45,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (4) One (1) receiving pit, identified as Dump #2, constructed in 2005, with maximum throughput rate of 18,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
- (b) One (1) completely enclosed internal handling operation, identified as EP-2, consisting of the following equipment:
- (1) One (1) drag conveyor, identified as Dump #1 Drag Conveyor, constructed in 2002, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (2) One (1) receiving leg, identified as Receiving Leg #1, constructed in 2002, with a

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maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.

- (3) One (1) bin 10 reclaim conveyor, identified as Bin 10 Reclaim Conveyor, constructed in 2002, with a maximum throughput rate of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (4) One (1) bin 20 reclaim, identified as Bin 20 Reclaim, constructed in 2002, with a maximum throughput rate capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (5) One (1) bin 30 reclaim, identified as Bin 30 Reclaim, constructed in 2002, with a maximum throughput rate of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (6) Two (2) storage bin reclaim conveyors, identified as Bin 15 Reclaim and Bin 25 Reclaim, constructed in 2005, each with a maximum throughput rate of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (7) One (1) storage bin fill conveyor, identified as Bin 25 Fill Conveyor, constructed in 2005, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (8) One (1) receiving pit conveyor, identified as Dump #2 Conveyor, constructed in 2005, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (9) One (1) receiving leg, identified as Receiving Leg #2, constructed in 2005, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (10) One (1) enclosed grain distributor, identified as Grain Distributor, constructed in 2005, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (11) One (1) storage bin reclaim conveyor, identified as Bin 26 Reclaim Conveyor, constructed in 2009, with a maximum throughput rate of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (12) One (1) storage bin fill conveyor, identified as Bin 26 Fill Conveyor, constructed in 2009, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (13) One (1) enclosed storage bin reclaim conveyor, identified as Bin 35 Reclaim Conveyor, approved for constructed in 2011, with a maximum throughput rate of 20,000 bushels per hour, and exhausting to the atmosphere.
 - (14) One (1) enclosed storage bin fill conveyor, identified as Bin 35 Fill Conveyor, approved for constructed in 2011, with a maximum throughput rate of 20,000 bushels per hour, and exhausting to the atmosphere.
- (c) One (1) storage area, identified as EP-5, consisting of the following equipment:
- (1) Two (2) storage bins, identified as Bin 10 and Bin 30, constructed in 2002, respectively, with a storage capacity of 111,000 bushels, and exhausting to the atmosphere.

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- (2) One (1) storage bin, identified as Bin 20, constructed in 2002, with a storage capacity of 24,000 bushels, and exhausting to the atmosphere.
 - (3) One (1) storage bin, identified as Bin 25, constructed in 2005, with a storage capacity of 450,000 bushels, and exhausting to the atmosphere.
 - (4) One (1) hopper bin, identified as Bin 15, constructed in 2005, with a storage capacity of 30,900 bushels, and exhausting to the atmosphere.
 - (5) One (1) storage bin, identified as Bin 26, constructed in 2009, with a storage capacity of 650,000 bushels, and exhausting to the atmosphere.
 - (6) One (1) storage bin, identified as Bin 35, approved for constructed in 2011, with a capacity of 1,040,000 bushels, and exhausting to the atmosphere.
- (d) One (1) barge shipping area, equipped with a spout, identified as EP-3, consisting of the following equipment:
- (1) One (1) shipping conveyor, identified as Shipping Conveyor, approved in 2016 for construction, with a maximum throughput rate of 45,000 bushels per hour to replace the existing 30,000 bushels per hour shipping conveyor constructed in 2002, and exhausting to the atmosphere.
 - (2) One (1) barge conveyor, identified as River Belt, approved for construction in 2014, with a maximum throughput rate of 50,000 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) barge loadout spout, identified as Barge Loadout Spout, constructed in 2002, with a maximum throughput rate of 50,000 bushels per hour, and exhausting to the atmosphere.
- (e) One (1) truck shipping area, equipped with a sock/sleeve, identified as EP-4, consisting of the following equipment:
- (1) One (1) bin 20 sidedraw truck loadout, identified as Bin 20 Sidedraw Truck Loadout, constructed in 2002, with a maximum throughput rate of 8,000 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) leg spout truck loadout, identified as Leg Spout Truck Loadout, constructed in 2002, with a maximum throughput rate of 18,000 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) bin 15 sidedraw truck loadout, identified as Bin 15 Sidedraw Truck Loadout, constructed in 2005, with a maximum throughput rate of 8,000 bushels per hour, and exhausting to the atmosphere.
 - (4) One (1) bin 25 sidedraw truck loadout, identified as Bin 25 Sidedraw Truck Loadout, constructed in 2005, with a maximum throughput rate of 8,000 bushels per hour, and exhausting to the atmosphere.
 - (5) One (1) bin 10 sidedraw truck loadout, identified as Bin 10 Sidedraw Truck Loadout, constructed in 2002, with a maximum throughput rate of 8,000 bushels per hour, and exhausting to the atmosphere.
- (f) One (1) 41.6 million British thermal units (MMBtu) per hour natural gas-fired grain dryer,

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identified as EP-7, constructed in 2006, with a maximum throughput rate of 4,000 bushels of grain per hour, and exhausting to the atmosphere.

- (g) One (1) dryer conveying area consisting of the following equipment:
 - (1) One (1) conveyor, identified as Wet Drag, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) conveyor, identified as Bottom Dry Drag, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) conveyor, identified as Top Dry Drag, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (4) One (1) conveyor, identified as Wet Leg, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (5) One (1) conveyor, identified as Dry Leg, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
- (h) Fugitive emissions from unpaved roads and parking lots. [326 IAC 6-5]
- (i) One (1) temporary ground pile, with a capacity of two million bushels, with a lime or asphalt base, with aeration, with walls for containment, approved in 2016 for conversion from an emergency ground pile.

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

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

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

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

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SECTION B

GENERAL CONDITIONS

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

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

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

- (a) This permit, F147-36979-00055, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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- (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
 - (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly

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signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Southwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

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- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

- (a) All terms and conditions of permits established prior to F147-36979-00055 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

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

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

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

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

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

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

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

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

DRAFT

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

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

DRAFT

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

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SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

DRAFT

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

DRAFT

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) 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]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

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

(1) initial inspection and evaluation;

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

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

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- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following, where applicable:
 - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

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.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) truck receiving operation, identified as EP-1, consisting of the following equipment:
 - (1) One (1) receiving pit, identified as Dump #1, constructed in 2002, with maximum throughput rate of 18,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (2) One (1) receiving pit, identified as River Dump #2, constructed in 2002, approved in 2016 to increase maximum throughput rate from 30,000 to 45,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (3) One (1) receiving pit, identified as River Dump #3, constructed in 2002, approved in 2016 to increase maximum throughput rate from 30,000 to 45,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (4) One (1) receiving pit, identified as Dump #2, constructed in 2005, with maximum throughput rate of 18,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
- (b) One (1) completely enclosed internal handling operation, identified as EP-2, consisting of the following equipment:
 - (1) One (1) drag conveyor, identified as Dump #1 Drag Conveyor, constructed in 2002, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (2) One (1) receiving leg, identified as Receiving Leg #1, constructed in 2002, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (3) One (1) bin 10 reclaim conveyor, identified as Bin 10 Reclaim Conveyor, constructed in 2002, with a maximum throughput rate of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (4) One (1) bin 20 reclaim, identified as Bin 20 Reclaim, constructed in 2002, with a maximum throughput rate capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (5) One (1) bin 30 reclaim, identified as Bin 30 Reclaim, constructed in 2002, with a maximum throughput rate of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (6) Two (2) storage bin reclaim conveyors, identified as Bin 15 Reclaim and Bin 25 Reclaim, constructed in 2005, each with a maximum throughput rate of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (7) One (1) storage bin fill conveyor, identified as Bin 25 Fill Conveyor, constructed in 2005, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.

DRAFT

- (8) One (1) receiving pit conveyor, identified as Dump #2 Conveyor, constructed in 2005, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (9) One (1) receiving leg, identified as Receiving Leg #2, constructed in 2005, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (10) One (1) enclosed grain distributor, identified as Grain Distributor, constructed in 2005, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (11) One (1) storage bin reclaim conveyor, identified as Bin 26 Reclaim Conveyor, constructed in 2009, with a maximum throughput rate of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (12) One (1) storage bin fill conveyor, identified as Bin 26 Fill Conveyor, constructed in 2009, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (13) One (1) enclosed storage bin reclaim conveyor, identified as Bin 35 Reclaim Conveyor, approved for constructed in 2011, with a maximum throughput rate of 20,000 bushels per hour, and exhausting to the atmosphere.
 - (14) One (1) enclosed storage bin fill conveyor, identified as Bin 35 Fill Conveyor, approved for constructed in 2011, with a maximum throughput rate of 20,000 bushels per hour, and exhausting to the atmosphere.
- (c) One (1) storage area, identified as EP-5, consisting of the following equipment:
- (1) Two (2) storage bins, identified as Bin 10 and Bin 30, constructed in 2002, respectively, with a storage capacity of 111,000 bushels, and exhausting to the atmosphere.
 - (2) One (1) storage bin, identified as Bin 20, constructed in 2002, with a storage capacity of 24,000 bushels, and exhausting to the atmosphere.
 - (3) One (1) storage bin, identified as Bin 25, constructed in 2005, with a storage capacity of 450,000 bushels, and exhausting to the atmosphere.
 - (4) One (1) hopper bin, identified as Bin 15, constructed in 2005, with a storage capacity of 30,900 bushels, and exhausting to the atmosphere.
 - (5) One (1) storage bin, identified as Bin 26, constructed in 2009, with a storage capacity of 650,000 bushels, and exhausting to the atmosphere.
 - (6) One (1) storage bin, identified as Bin 35, approved for constructed in 2011, with a capacity of 1,040,000 bushels, and exhausting to the atmosphere.
- (d) One (1) barge shipping area, equipped with a spout, identified as EP-3, consisting of the following equipment:
- (1) One (1) shipping conveyor, identified as Shipping Conveyor, approved in 2016 for construction, with a maximum throughput rate of 45,000 bushels per hour to replace the existing 30,000 bushels per hour shipping conveyor constructed in 2002, and

DRAFT

- exhausting to the atmosphere.
- (2) One (1) barge conveyor, identified as River Belt, approved for construction in 2014, with a maximum throughput rate of 50,000 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) barge loadout spout, identified as Barge Loadout Spout, constructed in 2002, with a maximum throughput rate of 50,000 bushels per hour, and exhausting to the atmosphere.
- (e) One (1) truck shipping area, equipped with a sock/sleeve, identified as EP-4, consisting of the following equipment:
- (1) One (1) bin 20 sidedraw truck loadout, identified as Bin 20 Sidedraw Truck Loadout, constructed in 2002, with a maximum throughput rate of 8,000 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) leg spout truck loadout, identified as Leg Spout Truck Loadout, constructed in 2002, with a maximum throughput rate of 18,000 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) bin 15 sidedraw truck loadout, identified as Bin 15 Sidedraw Truck Loadout, constructed in 2005, with a maximum throughput rate of 8,000 bushels per hour, and exhausting to the atmosphere.
 - (4) One (1) bin 25 sidedraw truck loadout, identified as Bin 25 Sidedraw Truck Loadout, constructed in 2005, with a maximum throughput rate of 8,000 bushels per hour, and exhausting to the atmosphere.
 - (5) One (1) bin 10 sidedraw truck loadout, identified as Bin 10 Sidedraw Truck Loadout, constructed in 2002, with a maximum throughput rate of 8,000 bushels per hour, and exhausting to the atmosphere.
- (f) One (1) 41.6 million British thermal units (MMBtu) per hour natural gas-fired grain dryer, identified as EP-7, constructed in 2006, with a maximum throughput rate of 4,000 bushels of grain per hour, and exhausting to the atmosphere.
- (g) One (1) dryer conveying area consisting of the following equipment:
- (1) One (1) conveyor, identified as Wet Drag, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) conveyor, identified as Bottom Dry Drag, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) conveyor, identified as Top Dry Drag, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (4) One (1) conveyor, identified as Wet Leg, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (5) One (1) conveyor, identified as Dry Leg, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.

DRAFT

- (h) Fugitive emissions from unpaved roads and parking lots. [326 IAC 6-5]
 - (i) One (1) temporary ground pile, with a capacity of two million bushels, with a lime or asphalt base, with aeration, with walls for containment, approved in 2016 for conversion from an emergency ground pile.
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.1.1 Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-2]

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

- (1) The throughput rates of the following operations shall not exceed the limits listed in the table below per twelve (12) consecutive month period with compliance determined at the end of each month:

Process Description	Annual Throughput Limits (tons per twelve (12) consecutive month period)
Grain Receiving	1,200,000
¹ Grain Internal Handling	3,600,000
Grain Drying	750,000
Storage Silos	1,200,000
Grain Shipping/Loadout	1,200,000

¹Based on three (3) internal handling steps that grain is handled through the internal handling system.

- (2) The following operations shall not exceed the limits listed in the table below for PM:

Process Description	PM Limits (lb PM/ton of Grain)
Grain Receiving	0.142
Grain Internal Handling	0.0183
Grain Drying	0.22
Storage Silos	0.025
Grain Shipping/Loadout	0.043

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

D.1.2 FESOP Limits [326 IAC 2-8]

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

- (a) The throughput rates of the following operations shall not exceed the limits listed in the table below per twelve (12) consecutive month period with compliance determined at the end of each month:

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Process Description	Annual Throughput Limits (tons per twelve (12) consecutive month period)
Grain Receiving	1,200,000
¹ Grain Internal Handling	3,600,000
Grain Drying	750,000
Storage Silos	1,200,000
Grain Shipping/Loadout	1,200,000

¹Based on three (3) internal handling steps that grain is handled through the internal handling system.

- (b) The following operations shall not exceed the limits listed in the table below for PM10:

Process Description	PM10 Limits (lb PM10/ton of Grain)
Grain Receiving	0.047
¹ Grain Internal Handling	0.0102
Grain Drying	0.055
Storage Silos	0.0063
Grain Shipping/Loadout	0.0145

Compliance with these limits, combined with the potential to emit PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 to less than 100 tons per year and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable to the source.

D.1.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of the following processes shall not exceed the pound per hour limits as follows:

Emissions Unit Description	Maximum Process Weight (tons/hr)	Allowable PM Emissions (lbs/hr)
Dump #1	540	69.9
River Dump #2	1,350	81.5
River Dump #3	1,350	81.5
Dump #2	540	69.9
Dump #1 Drag Conveyor	540	69.9
Receiving Leg #1	540	69.9
Bin 10 Reclaim Conveyor	600	71.2
Bin 20 Reclaim	600	71.2
Bin 30 Reclaim	600	71.2
Bin 15 Reclaim	600	71.2
Bin 25 Reclaim	600	71.2
Bin 25 Fill Conveyor	540	69.9
Dump #2 Conveyor	540	69.9
Receiving Leg #2	540	69.9
Grain Distributor	540	69.9
Bin 26 Reclaim Conveyor	600	71.2

DRAFT

Emissions Unit Description	Maximum Process Weight (tons/hr)	Allowable PM Emissions (lbs/hr)
Bin 26 Fill Conveyor	540	69.9
Bin 35 Reclaim Conveyor	600	71.2
Bin 35 Fill Conveyor	540	69.9
Shipping Conveyor (River Hi Roller)	1,350	81.5
Barge Conveyor (River Belt)	1,500	83.0
Barge Loadout Spout	1,500	83.0
Bin 20 Sidedraw Truck	240	60.5
Leg Spout Truck Loadout	540	69.9
Bin 15 Sidedraw Truck	240	60.5
Bin 25 Sidedraw Truck	240	60.5
Bin 10 Sidedraw Truck	240	60.5
Grain Dryer	120	53.1
Wet Drag	195	58.2
Bottom Dry Drag	195	58.2
Top Dry Drag	195	58.2
Wet Leg	195	58.2
Dry Leg	195	58.2

The pounds per hour limitations for the emissions units in the above table shall be calculated using the following equation:

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

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

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

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

A Preventive Maintenance Plan (PMP) is required for these units. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition

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

D.1.5 Particulate Control [326 IAC 2 8 4(1)]

In order to comply with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall comply with the following work practices:

- (a) The baffles for particulate control, associated with the Grain Receiving Pits shall be in place and in good operating condition at all times that grain is dumped into the receiving pits.
- (b) The sock or sleeve for particulate control, associated with the Grain Truck Loadout- shall be in place and in good operating condition, should be replaced when shows sign of tear and must be operated that it extends at least six (6) inches inside the average truck bed at all times when grain is loaded out via trucks.

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- (c) The spout for particulate control, associated with the Barge Loadout/Shipping shall be extended up to the barge tank lid when grain is loaded out into barges.
- (d) The grain throughput to Dump #1, River Dump #2, River Dump #3, and Dump #2 shall each not exceed 950,000 pounds per hour, when using straight trucks.

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

D.1.6 Recordkeeping Requirements [326 IAC 2 8 4(3)]

- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain monthly records of the following:
 - (1) The total amount of grain received.
 - (2) The total amount of grain handled through the internal handling system that is based on the number of steps the grain go through the same internal handling system. Note: The amount of grain is multiplied by the number of steps it goes through the same internal handling system.
 - (3) The total amount of grain stored into storage silos.
 - (4) The total amount of grain processed in the grain dryer
 - (5) The total amount of grain shipped or loaded out.
- (b) To document the compliance status with the particulate emission limits in Conditions D.1.3 and D.1.5(d) for Dump #1, River Dump #2, River Dump #3, and Dump #2, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken hourly during grain handling and shall be complete and sufficient to establish compliance with the particulate emissions limit established in Condition D.1.3:
 - (1) The grain throughput to Dump #1, River Dump #2, River Dump #3, and Dump #2, using straight trucks.
- (c) To document the a compliance status with Condition D.1.5, the Permittee shall maintain a log of weekly inspections of the dump pits baffles panels, truck loadout sock/sleeve and barge loadout spout.
- (d) Section C - General Recordkeeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.7 Reporting Requirements [326 IAC 2 8 4(3)]

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: ADM Grain Company
Source Address: 609 North State Road 66, Rockport, IN 47635
FESOP Permit No.: F147-36979-00055

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)_____
- Report (specify)_____
- Notification (specify)_____
- Affidavit (specify)_____
- Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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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
Phone: (317) 233-0178
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: ADM Grain Company
Source Address: 609 North State Road 66, Rockport, IN 47635
FESOP Permit No.: F147-36979-00055

This form consists of 2 pages

Page 1 of 2

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

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

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

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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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: ADM Grain Company
Source Address: 609 North State Road 66, Rockport, IN 47635
FESOP Permit No.: F147-36979-00055
Facility: Grain Receiving Station
Parameter: Weight of total grain received
Limit: Throughput not to exceed 1,200,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

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

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

FESOP Quarterly Report

Source Name: ADM Grain Company
Source Address: 609 North State Road 66, Rockport, IN 47635
FESOP Permit No.: F147-36979-00055
Facility: Grain Internal Handling System
Parameter: Weight of total grain handled into the internal handling system
Limit: Throughput not to exceed 3,600,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Note: The amount of grain is multiplied by the number of steps it goes through the same internal handling system.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

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

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

FESOP Quarterly Report

Source Name: ADM Grain Company
Source Address: 609 North State Road 66, Rockport, IN 47635
FESOP Permit No.: F147-36979-00055
Facility: Grain Dryer
Parameter: Weight of total grain dried in the grain dryer
Limit: Throughput not to exceed 750,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

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

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

FESOP Quarterly Report

Source Name: ADM Grain Company
Source Address: 609 North State Road 66, Rockport, IN 47635
FESOP Permit No.: F147-36979-00055
Facility: Grain Storage Silos
Parameter: Weight of total grain stored into silos
Limit: Throughput not to exceed 1,200,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

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

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

FESOP Quarterly Report

Source Name: ADM Grain Company
Source Address: 609 North State Road 66, Rockport, IN 47635,, Indiana
FESOP Permit No.: F147-36979-00055
Facility: Grain Shipping/Loadout
Parameter: Weight of total grain loaded out
Limit: Throughput not to exceed 1,200,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

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

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

Source Name: ADM Grain Company
Source Address: 609 North State Road 66, Rockport, IN 47635
FESOP Permit No.: F147-36979-00055

Months: _____ to _____ Year: _____

Page 1 of 2

<p>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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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:	

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Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attachment A

FUGITIVE DUST CONTROL PLAN

FESOP 147-36979-00055

**ADM Grain Company
609 N State Road 66
Rockport, IN 47635**

Attachment A - Fugitive Dust Control Plan

The fugitive dust control plan components listed below will be implemented at the Rockport, Indiana facility at the address listed above. The components are outlined below:

The Rockport facility receives grain by truck and is shipped out by barge and trucks directly to ADM's customers. Our complete list of processes and emission points are attached; along with a map showing our facility in detail.

Our fugitive emissions primarily come from our unpaved haul roads. We currently see approximately 90 trucks a day. The fugitive particulate matter (dust) that results from our unpaved haul roads is what needs to be addressed. These roads are used more frequently during our harvest season, which is late September running through the later part of November.

Currently the facility treats the haul roads with calcium chloride normally once a year or as needed. This frequency is determined by the location manager once he sees the dust becoming a problem then calcium chloride is added more often than once a year.

The facility has not made a practice of documenting the frequency of the application, but going forward with the creation of this plan, will, indeed document the amount of calcium chloride used and the frequency of the application. These records will continue to be maintained and presented upon request of the commissioner and shall be retained for a period of three (3) years.

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

Technical Support Document (TSD) for a Minor Source Operating Permit
(MSOP) Transitioning to a Federally Enforceable State Operating Permit
(FESOP)

Source Description and Location

Source Name: ADM Grain Company
Source Location: 609 N State Road 66, Rockport, IN 47635
County: Spencer
SIC Code: 5153 (Grain and Field Beans)
Operation Permit No.: F147-36979-00055
Permit Reviewer: Aida DeGuzman

On March 21, 2016, the Office of Air Quality (OAQ) received an application from ADM Grain Company related to the replacement of the shipping conveyor and conversion of an emergency ground pile into a temporary ground pile. This emergency ground pile is currently permitted in the MSOP. The source will transition from a Minor Source Operating Permit (MSOP) to a Federally Enforceable State Operating Permit (FESOP) for its stationary country grain elevator.

Existing Approvals

The source was issued MSOP Renewal No.: M147-28763-00055 on March 30, 2010. The source has since received the following approvals:

- (a) Notice Only Change No.: 147-29914-00055, issued on February 17, 2011;
- (b) Significant Permit Revision No.: 147-34289-00055, issued on August 20, 2014; and
- (c) Administrative Amendment No.: 147-36414-00055, issued on November 25, 2015.

County Attainment Status

The source is located in Spencer County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Attainment effective October 27, 2011, for the annual PM2.5 standard for Ohio Township. Unclassifiable or attainment effective April 5, 2005, for the annual PM2.5 standard for the remainder of the county.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Spencer County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Spencer County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Spencer County has been classified as attainment or unclassifiable in Indiana for PM, PM₁₀, and CO. 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. The source is not a listed source category that is regulated under a New Source Performance Standard (Subpart DD) that was in effect on August 7, 1980, because the source does not have a permanent storage capacity of 2.5 million U.S. bushels. The proposed conversion of the existing emergency ground pile into a permanent storage facility still does not make the source subject to this NSPS because "permanent storage capacity" only counts storage capacity located inside a building, bin or silo. Further USEPA letter addressed to Mr. Jess McCluer of National Grain and Feed Association (NGFA), dated July 1, 2014 rescinded the November 21, 2007 letter to the NGFA that determined temporary storage facilities meets the definition of "permanent storage capacity". Therefore fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units and New Source Review

The Office of Air Quality (OAQ) has reviewed an application, submitted by ADM Grain Company on March 21, 2016, relating to increasing speed to two (2) pits from 30,000 bushels per hour to 45,000 bushels per hour, removal of pit 0 in the permit since it was not constructed, conversion of an existing emergency grain storage pile into a temporary storage unit and the replacement of an existing 30,000 bushels per hour grain shipping conveyor into a larger grain conveyor with a maximum throughput of 45,000 bushels per hour. The source will also transition from a MSOP to FESOP.

The following is a list of the new emission units and pollution control devices affected by these activities:

- (a) One existing (1) temporary ground pile, with a capacity of two million bushels, with a lime or asphalt base, with aeration, with walls for containment, approved in 2016 for conversion from an emergency ground pile.
- (b) One (1) shipping conveyor, identified as Shipping Conveyor, approved in 2016 for construction, with a maximum capacity of 45,000 bushels per hour to replace the existing 30,000 bushels per hour shipping conveyor constructed in 2002, and exhausting to the atmosphere.
- (c) One (1) receiving pit, identified as River Dump #2, constructed in 2002, approved in 2016 to increase throughput rate from 30,000 to 45,000 bushels of grain per hour while maintaining the annual maximum throughput rate, with particulate emissions controlled by baffles, and exhausting to the atmosphere.

- (d) One (1) receiving pit, identified as River Dump #3, constructed in 2002, approved in 2016 to increase throughput rate from 30,000 to 45,000 bushels of grain per hour while maintaining the annual maximum throughput rate, with particulate emissions controlled by baffles, and exhausting to the atmosphere.

The source consists of the following permitted emission units:

- (a) One (1) truck receiving operation, identified as EP-1, consisting of the following equipment:
- (1) One (1) receiving pit, identified as Dump #1, constructed in 2002, with maximum throughput rate of 18,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (2) One (1) receiving pit, identified as River Dump #2, constructed in 2002, approved in 2016 to increase maximum throughput rate from 30,000 to 45,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (3) One (1) receiving pit, identified as River Dump #3, constructed in 2002, approved in 2016 to increase maximum throughput rate from 30,000 to 45,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
 - (4) One (1) receiving pit, identified as Dump #2, constructed in 2005, with maximum throughput rate of 18,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.
- (b) One (1) completely enclosed internal handling operation, identified as EP-2, consisting of the following equipment:
- (1) One (1) drag conveyor, identified as Dump #1 Drag Conveyor, constructed in 2002, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (2) One (1) receiving leg, identified as Receiving Leg #1, constructed in 2002, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (3) One (1) bin 10 reclaim conveyor, identified as Bin 10 Reclaim Conveyor, constructed in 2002, with a maximum throughput rate of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (4) One (1) bin 20 reclaim, identified as Bin 20 Reclaim, constructed in 2002, with a maximum throughput rate capacity of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (5) One (1) bin 30 reclaim, identified as Bin 30 Reclaim, constructed in 2002, with a maximum throughput rate of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (6) Two (2) storage bin reclaim conveyors, identified as Bin 15 Reclaim and Bin 25 Reclaim, constructed in 2005, each with a maximum throughput rate of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (7) One (1) storage bin fill conveyor, identified as Bin 25 Fill Conveyor, constructed in 2005, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.

- (8) One (1) receiving pit conveyor, identified as Dump #2 Conveyor, constructed in 2005, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (9) One (1) receiving leg, identified as Receiving Leg #2, constructed in 2005, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (10) One (1) enclosed grain distributor, identified as Grain Distributor, constructed in 2005, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (11) One (1) storage bin reclaim conveyor, identified as Bin 26 Reclaim Conveyor, constructed in 2009, with a maximum throughput rate of 20,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (12) One (1) storage bin fill conveyor, identified as Bin 26 Fill Conveyor, constructed in 2009, with a maximum throughput rate of 18,000 bushels of grain per hour, and exhausting to the atmosphere.
 - (13) One (1) enclosed storage bin reclaim conveyor, identified as Bin 35 Reclaim Conveyor, approved for constructed in 2011, with a maximum throughput rate of 20,000 bushels per hour, and exhausting to the atmosphere.
 - (14) One (1) enclosed storage bin fill conveyor, identified as Bin 35 Fill Conveyor, approved for constructed in 2011, with a maximum throughput rate of 20,000 bushels per hour, and exhausting to the atmosphere.
- (c) One (1) storage area, identified as EP-5, consisting of the following equipment:
- (1) Two (2) storage bins, identified as Bin 10 and Bin 30, constructed in 2002, respectively, with a storage capacity of 111,000 bushels, and exhausting to the atmosphere.
 - (2) One (1) storage bin, identified as Bin 20, constructed in 2002, with a storage capacity of 24,000 bushels, and exhausting to the atmosphere.
 - (3) One (1) storage bin, identified as Bin 25, constructed in 2005, with a storage capacity of 450,000 bushels, and exhausting to the atmosphere.
 - (4) One (1) hopper bin, identified as Bin 15, constructed in 2005, with a storage capacity of 30,900 bushels, and exhausting to the atmosphere.
 - (5) One (1) storage bin, identified as Bin 26, constructed in 2009, with a storage capacity of 650,000 bushels, and exhausting to the atmosphere.
 - (6) One (1) storage bin, identified as Bin 35, approved for constructed in 2011, with a capacity of 1,040,000 bushels, and exhausting to the atmosphere.
- (d) One (1) barge shipping area, equipped with a spout, identified as EP-3, consisting of the following equipment:
- (1) One (1) shipping conveyor, identified as Shipping Conveyor, approved in 2016 for construction, with a maximum throughput rate of 45,000 bushels per hour to replace the existing 30,000 bushels per hour shipping conveyor constructed in 2002, and exhausting to the atmosphere.

- (2) One (1) barge conveyor, identified as River Belt, approved for construction in 2014, with a maximum throughput rate of 50,000 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) barge loadout spout, identified as Barge Loadout Spout, constructed in 2002, with a maximum throughput rate of 50,000 bushels per hour, and exhausting to the atmosphere.
- (e) One (1) truck shipping area, equipped with a sock/sleeve, identified as EP-4, consisting of the following equipment:
- (1) One (1) bin 20 sidedraw truck loadout, identified as Bin 20 Sidedraw Truck Loadout, constructed in 2002, with a maximum throughput rate of 8,000 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) leg spout truck loadout, identified as Leg Spout Truck Loadout, constructed in 2002, with a maximum throughput rate of 18,000 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) bin 15 sidedraw truck loadout, identified as Bin 15 Sidedraw Truck Loadout, constructed in 2005, with a maximum throughput rate of 8,000 bushels per hour, and exhausting to the atmosphere.
 - (4) One (1) bin 25 sidedraw truck loadout, identified as Bin 25 Sidedraw Truck Loadout, constructed in 2005, with a maximum throughput rate of 8,000 bushels per hour, and exhausting to the atmosphere.
 - (5) One (1) bin 10 sidedraw truck loadout, identified as Bin 10 Sidedraw Truck Loadout, constructed in 2002, with a maximum throughput rate of 8,000 bushels per hour, and exhausting to the atmosphere.
- (f) One (1) 41.6 million British thermal units (MMBtu) per hour natural gas-fired grain dryer, identified as EP-7, constructed in 2006, with a maximum throughput rate of 4,000 bushels of grain per hour, and exhausting to the atmosphere.
- (g) One (1) dryer conveying area consisting of the following equipment:
- (1) One (1) conveyor, identified as Wet Drag, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (2) One (1) conveyor, identified as Bottom Dry Drag, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (3) One (1) conveyor, identified as Top Dry Drag, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (4) One (1) conveyor, identified as Wet Leg, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
 - (5) One (1) conveyor, identified as Dry Leg, constructed in 2006, with a maximum throughput rate of 6,500 bushels per hour, and exhausting to the atmosphere.
- (h) Fugitive emissions from unpaved roads and parking lots. [326 IAC 6-5]
- (i) One (1) temporary ground pile, with a capacity of two million bushels, with a lime or asphalt base,

with aeration, with walls for containment, approved in 2016 for conversion from an emergency ground pile.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Note: The new shipping conveyor that will replace existing shipping conveyor, the conversion of an emergency storage pile into a temporary storage unit, the increase in hourly throughput rates to two pits will not result in increased potential to emit since the increase in hourly throughput rates to the pits, new larger conveyor will not increase the source's throughput that is based on the highest grain received from previous 5 years multiplied by an adjustment factor of 1.2. However, the result of the transition to a higher permitting level is due to unaccounted PTE from the internal handling operation. The grain is handled three (3) times through the internal handling system. Therefore, the PTE for the internal handling operation will be multiplied 3x, this corrected the prior PTE calculations which was only based on one time grain internal handling.

Permit Level Determination – FESOP

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

Pollutant	Potential To Emit (tons/year)
PM	364.7
PM10 ⁽¹⁾	133.29
PM2.5 ⁽¹⁾	23.83
SO ₂	0.11
NO _x	17.86
VOC	0.98
CO	15.01

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

HAPs	Potential To Emit (tons/year)
Hexane	0.32
TOTAL HAPs	0.34

(a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of PM10 is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

PTE of the Entire Source After Issuance of the FESOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10 *	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Grain Receiving	85.32	35.40	6.00	0.00	0.00	0.00	0.00	0.00	0.00
Headhouse/Internal Grain Handling	32.94	18.36	3.13	0.00	0.00	0.00	0.00	0.00	0.00
Grain Drying	82.50	20.63	3.53	0.00	0.00	0.00	0.00	0.00	0.00
Grain Storage	15.00	3.78	0.66	0.00	0.00	0.00	0.00	0.00	0.00
Natural gas Combustion	0.34	1.36	1.36	0.11	17.86	0.98	15.01	0.34	0.32 (Hexane)
Grain Shipping	25.80	8.70	1.47	0.00	0.00	0.00	0.00	0.00	0.00
1Total PTE of Entire Source	241.90	88.22	16.14	0.11	17.86	0.98	15.01	0.34	0.32 (Hexane)
Fugitives Emissions not Counted towards the Source-wide PTE.									
Temporary Storage Piles	11.04	3.63	0.69	0.00	0.00	0.00	0.00	0.00	0.00
Fugitive Emissions from Unpaved Roads	25.03	6.38	0.83	0.00	0.00	0	0.00	0.00	0.00
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
negl. = negligible *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".									

- (a) **FESOP Status**
 This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is naturally less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

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

- (1) The throughput rates of the following operations shall not exceed the limits listed in the table below per twelve (12) consecutive month period with compliance determined at the end of each month:

Process Description	Annual Throughput Limits (tons per twelve (12) consecutive month)
Grain Receiving	1,200,000
¹ Grain Internal Handling	3,600,000
Grain Drying	750,000
Storage Silos	1,200,000
Grain Shipping/Loadout	1,200,000

¹Based on three (3) internal handling steps that grain is handled through the internal handling system.

- (2) The following operations shall not exceed the limits listed in the table below for PM10:

Process Description	PM10 Limits (lb PM10/ton of Grain)
Grain Receiving	0.047
¹ Grain Internal Handling	0.0102
Grain Drying	0.055
Storage Silos	0.0063
Grain Shipping/Loadout	0.0145

Compliance with these limits, combined with the potential to emit PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 to less than 100 tons per year, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable to the source.

(b) PSD Minor Source

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

- (1) The potential to emit PM is limited to less than 250 tons per year,
- (2) The potential to emit all other PSD regulated pollutants are less than 250 tons per year,
- (3) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1), and

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

- (1) The throughput rates of the following operations shall not exceed the limits listed in the table below per twelve (12) consecutive month period with compliance determined at the end of each month:

Process Description	Annual Throughput Limits (tons per twelve (12) consecutive month period)
Grain Receiving	1,200,000
¹ Grain Internal Handling	3,600,000
Grain Drying	750,000
Storage Silos	1,200,000
Grain Shipping/Loadout	1,200,000

- (2) The following operations shall not exceed the limits listed in the table below for PM:

Process Description	PM Limits (lb PM/ton of Grain)
Grain Receiving	0.142
¹ Grain Internal Handling	0.0183
Grain Drying	0.22
Storage Silos	0.025
Grain Shipping/Loadout	0.043

¹Based on three (3) internal handling steps that grain is handled through the internal handling system.

Note: It is not necessary to limit PM10 and PM2.5 for PSD purposes because these pollutants uncontrolled PTE are each well below 250 tons per year.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the source.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) 40 CFR 60, Subpart DD - New Source Performance Standard for Grain Elevators
 The requirements of 40 CFR 60, Subpart DD are not included for the grain elevator because it does not have a permanent storage capacity of 2.5 million U.S. bushels. The proposed conversion of the existing emergency ground pile into a temporary storage facility still does not make the source subject to this NSPS because "permanent storage capacity" only counts storage capacity located inside a building, bin or silo. Further USEPA letter addressed to Mr. Jess McCluer of National Grain and Feed Association (NGFA), dated July 1, 2014 rescinded the November 21, 2007 letter to the NGFA that determined temporary storage facilities meets the definition of "storage capacity".
- (b) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standard for Hazardous Air Pollutants.

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the existing source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is subject to the requirements of 326 IAC 6-5, because the grain elevator has potential fugitive particulate emissions greater than 25 tons per year. Pursuant to 326 IAC 6-5, fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan, submitted on November 12, 2008 which is included as Attachment A to the permit.
- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from each of the listed emission units shall be limited as shown in the following table:

Emissions Unit Description	Maximum (bushels/hr) for each unit of that type	Maximum Process Weight (tons/hr)	PM Emission Factor (lbs/ton)	Control Efficiency (%)	PM Emissions Before Control (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)	PM Emissions After Control (lbs/hr)	Control required for Compliance ? Yes/No	Remarks (Yes - in Compliance, No - Not in Compliance)
Dump #1	18,000	540	0.18	21%	97.2	69.9	76.8	Yes	No
River Dump #2	45,000	1350	0.18	21%	243.0	81.5	192.0	Yes	No
River Dump #3	45,000	1350	0.18	21%	243.0	81.5	192.0	Yes	No
Dump #2	18,000	540	0.18	21%	97.2	69.9	76.8	Yes	No
Dump #1 Drag Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Receiving Leg #1	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Bin 10 Reclaim Conveyor	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 20 Reclaim	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 30 Reclaim	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 15 Reclaim	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 25 Reclaim	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 25 Fill Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Dump #2 Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Receiving Leg #2	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Grain Distributor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Bin 26 Reclaim Conveyor	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 26 Fill Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Bin 35 Reclaim Conveyor	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 35 Fill Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Shipping Conveyor (River Hi Roller)	45,000	1,350	0.016	50%	21.6	81.5	10.8	No	Yes
Barge Conveyor (River Belt)	50,000	1,500	0.016	50%	24.0	83.0	12.0	No	Yes
Barge Loadout Spout	50,000	1,500	0.016	50%	24.0	83.0	12.0	No	Yes
Bin 20 Sidedraw Truck	8,000	240	0.029	50%	7.0	60.5	3.5	No	Yes
Leg Spout Truck Loadout	18,000	540	0.029	50%	15.7	69.9	7.8	No	Yes
Bin 15 Sidedraw Truck	8,000	240	0.029	50%	7.0	60.5	3.5	No	Yes
Bin 25 Sidedraw Truck	8,000	240	0.029	50%	7.0	60.5	3.5	No	Yes
Bin 10 Sidedraw Truck	8,000	240	0.029	50%	7.0	60.5	3.5	No	Yes
Grain Dryer	4,000	120	0.22	N/A	26.4	53.1	26.4	No	Yes
Wet Drag	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes
Bottom Dry Drag	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes
Top Dry Drag	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes
Wet Leg	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes
Dry Leg	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes

The above limits were determined using the following equation:

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

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

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

The grain pit receiving in Dump #1, River Dump #2, River Dump #3, and Dump #2 do not meet the particulate emission limits required in 326 IAC 6-3 as reflected in the above table. Therefore, by limiting the grain throughput handled using straight trucks will make these units comply with 326 IAC 6-3. However, it is not necessary to limit the grain handled via hopper trucks since at 100% hopper trucks the pits comply with the rule. See the straight trucks limits in the following table:

Emissions Unit Description	Maximum (bushels/hr) for each unit of that type	Maximum Process Weight (tons/hr) for each unit of that type	Process Weight Limit (lbs/hr)	PM Emission Factor (lbs/ton)	Control Efficiency (%)	PM Emissions Before Control (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr) for each unit of that type	PM Emissions After Control (lbs/hr)	Control required for Compliance ? Yes/No	Remarks (Yes - in Compliance, No - Not in Compliance)
Grain Receiving Using Combination of Straight Trucks and Hopper Trucks in each Dump Station to Meet 326 IAC 6-3-2										
Dump #1 - Trucks	18,000	475	950,000	0.18	21%	85.5	68.3	67.5	Yes	Yes
Dump#1 - Hopper Trucks		65		0.035	21%	2.3	47.1	1.8	No	Yes
River Dump #2 - Trucks	45,000	475	950,000	0.18	21%	85.5	68.3	67.5	Yes	Yes
River Dump #2 - Hopper Trucks		875		0.035	21%	30.6	75.9	24.2	Yes	Yes
River Dump #3 - Trucks	45,000	475	950,000	0.18	21%	85.5	68.3	67.5	Yes	Yes
River Dump #3 - Hopper Trucks		875		0.035	21%	30.6	75.9	24.2	No	Yes
Dump #2 - Trucks	18,000	475	950,000	0.18	21%	85.5	68.3	67.5	Yes	Yes
Dump #2 - Hopper Trucks		65		0.035	21%	2.3	47.1	1.8	No	Yes
Pit 0 - Trucks	50,000	475	950,000	0.18	21%	85.5	68.3	67.5	Yes	Yes
Pit 0 - Hopper Trucks		1,025		0.035	21%	35.9	77.9	28.3	No	

- (i) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)
 The one (1) grain dryer is not subject to the requirements of 326 IAC 6-2, because it is not a source of indirect heating.
- (j) 326 IAC 12 (New Source Performance Standards)
 See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)
 See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Baffles (Dump Pits)	Be in operation when grain is dumped into dump pits	At all times grain is dumped
Sleeve/Sock (Truck Loadout)	Be in place and in good operating condition, should be replaced when shows sign of tear and must be operated that it extends at least 6 inches inside the average truck bed.	At all times that grain is loadout truck conveyor is in operation
Spout (Barge Loadout)	Barge loadout spout shall be extended up to the barge tank, lid when loading grain to barges	At all times grain is loaded out into barges

Other Changes

Upon further review IDEM, OAQ has made the following changes to this proposed FESOP No. F147-36979-00055. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language bolded.

- Change 1: One receiving pit, identified as Pit 0 has been removed from the permit, since it was not constructed.
- (5) One receiving pit, identified as Pit 0, approved in 2014 for construction, receiving a maximum capacity of 50,000 bushels of grain per hour, with particulate emissions controlled by baffles, and exhausting to the atmosphere.

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 March 21, 2016. Additional information was received on June 6, 7, 9 and 10, 2016

The operation of this source shall be subject to the conditions of the attached proposed FESOP No.147-36979-00055. The staff recommends to the Commissioner that this FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Aida DeGuzman 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) 233-4972 or toll free at 1-800-451-6027 extension 3-4972.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
Summary**

Company Name: ADM Grain Company
Address City IN Zip: 609 N. State Road 66, Rockport, IN 47635
SIC Code: 5153
Operating Permit Number: F147-36979-00055
Reviewer: Aida DeGuzman

Uncontrolled Potential to Emit (tons/year)									
Emissions Process / Unit	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Worst case single HAP (Hexane)	Total HAPs
Natural Gas Combustion	0.34	1.36	1.36	0.11	17.86	0.98	15.01	0.32	0.34
Grain Receiving	108.00	35.40	6.00	0.00	0.00	0.00	0.00	0.00	0.00
Grain Shipping	51.60	17.40	2.94	0.00	0.00	0.00	0.00	0.00	0.00
Headhouse and Grain Handling	109.80	61.20	10.44	0.00	0.00	0.00	0.00	0.00	0.00
Grain Drying	132.00	33.00	5.64	0.00	0.00	0.00	0.00	0.00	0.00
Grain storage (silos)	15.00	3.78	0.66	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL - Non-Fugitive	416.74	152.14	27.04	0.11	17.86	0.98	15.01	0.32	0.34
*Fugitive Emissions:									
Permanent Storage Pile	11.04	3.63	0.69	0.00	0.00	0.00	0.00	0.00	0.00
Fugitive Emissions from Unpaved Roads	62.57	15.95	2.07	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL -Fugitive	73.6	19.6	2.8	0.0	0.0	0.0	0.0	0.0	0.0
TOTAL - Fugitive and non-fugitive	490.35	171.71	29.79	0.11	17.86	0.98	15.01	0.32	0.34

Note 1: Total emissions based on a maximum throughput equal to or less than 40,000,000 bushels/grain per year (1,200,000 tons per year).

*The source is not a listed source category under 40 CFR, Subpart DD since it does not have permanent storage of 2.5 million bushels per year. On July 1, 2014, EPA rescinded the letter dated 11/21/2007 to Kendall Keith of the National Grain and Feed Association that temporary storage piles are considered "permanent storage capacity for the purpose of Subpart DD. Therefore, based on this rescission, ADM permanent capacity is still < 2.5 million bushels and not subject to Subpart DD. Therefore, fugitive emissions are not counted toward TV, and PSD applicability.

Limited Potential to Emit (tons/year)									
Emissions Process / Unit	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Worst case single HAP (Hexane)	Total HAPs
Natural Gas Combustion	0.34	1.36	1.36	0.11	17.86	0.98	15.01	0.32	0.34
Grain Receiving	85.32	35.40	6.00	0.00	0.00	0.00	0.00	0.00	0.00
Grain Shipping	25.80	8.70	1.47	0.00	0.00	0.00	0.00	0.00	0.00
Headhouse and Grain Handling	32.94	18.36	3.13	0.00	0.00	0.00	0.00	0.00	0.00
Grain Drying	82.50	20.63	3.53	0.00	0.00	0.00	0.00	0.00	0.00
Grain storage (silos)	15.00	3.78	0.66	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL - Non-Fugitive	241.90	88.22	16.14	0.11	17.86	0.98	15.01	0.32	0.34
*Fugitive Emissions:									
Permanent Storage Pile	11.04	3.63	0.69	0.00	0.00	0.00	0.00	0.00	0.00
Fugitive Emissions from Unpaved Roads	31.29	7.97	1.03	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL -Fugitive	42.3	11.6	1.7	0.0	0.0	0.0	0.0	0.0	0.0
TOTAL - Fugitive and non-fugitive	284.23	99.82	17.86	0.11	17.86	0.98	15.01	0.32	0.34

See Note1 above.

Appendix A: Emissions Calculations
Grain Elevator - Uncontrolled and Unlimited PTE

Company Name: ADM Grain Company
Address City IN Zip: 609 N. State Road 66, Rockport, IN 47635
SIC Code: 5153
Operating Permit Number: F147-36979-00055
Reviewer: Aida DeGuzman

Grain	bushels/year	¹ lbs / bushel	Grain Throughput (tons/year)
Grain	40,000,000	60	1,200,000

Note 1: Assumes 60 lb/bushel for Wheat and Soybeans and 56 lb/bushel for corn; therefore, 60 lb/bushel was used to calculate the maximum PTE.

Unloading/Receiving					
² Straight Truck (lb/ton)			² Hopper Truck		
PM	PM-10	PM2.5	PM	PM-10	PM2.5
0.18	0.059	0.01	0.035	0.0078	0.0013

Unloading/ Receiving	PM	PM10	PM2.5
Straight Truck	108.000	35.400	6.000
Hopper Truck	21.000	4.680	0.780
Total worst uncontrolled	108.000	35.400	6.000
⁴ Controlled	85.320	27.966	4.740

Note 2: Source receives grain from both straight truck and hopper truck. All grain is conservatively assumed to be received using the methodology with the worst case emission factor.

Note 3: A control efficiency of 21% is used for the baffles which was taken from Page 4-25 of the "Background Information" of AP-42, Section 9.9.1).

This corrected the 60% control efficiency in prior PTE calculations, reflected in 147-36414-00055 which has no basis and the source the source does not have any baghouse or other control to consider a higher control efficiency for the baffles.

⁵ Shipping					
Truck (lb/ton)			Barge		
PM	PM-10	PM2.5	PM	PM-10	PM2.5
0.086	0.029	0.0049	0.016	0.004	0.00055

Shipping	PM	PM10	PM2.5
Straight Truck	51.600	17.400	2.940
⁷ Barge	9.600	2.400	0.330
Total worst uncontrolled	51.600	17.400	2.940

Note 6: Source ships grain both through straight trucks and barges. All grain is conservatively assumed to be ship via straight truck.

Note 7: The AP-42 emission factor for barge shipping was determined with spouts.

Methodology

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03)

Potential Emissions (ton/yr) = Throughput (ton/yr)* Emission factor (lb/ton) / 2000 (lbs/ton)

Controlled Potential Emissions (ton/yr) = Throughput (ton/yr) * Emission factor (lb/ton) / 2000 (lbs/ton)* (1-Control Efficiency)

Drying		
PM	PM-10	PM2.5
0.22	0.055	0.0094

Drying	PM	PM10	PM2.5
Total uncontrolled	132.000	33.000	5.640

*Headhouse and Grain Handling		
PM	PM-10	PM2.5
0.061	0.034	0.0058

	PM	PM10	PM2.5
Total uncontrolled	109.800	61.200	10.440

* The grain is handled 3 times through the internal handling system.

Therefore, the PTE for the handling is multiplied 3 x, this corrected the prior PTE calculations, which was only based on one time grain handling.

Storage		
PM	PM-10	PM2.5
0.025	0.0063	0.0011

storage	PM	PM10	PM2.5
uncontrolled	15.000	3.780	0.660

**Appendix A: Emissions Calculations
Grain Elevator - LIMITED PTE**

Company Name: ADM Grain Company
Address City IN Zip: 609 N. State Road 66, Rockport, IN 47635
SIC Code: 5153
Operating Permit Number: F147-36979-00055
Reviewer: Aida DeGuzman

LIMITED PTE			
Grain	Limited bushels/year	¹ lbs / bushel	Limited Grain Throughput (tons/year)
Grain	40,000,000	60	1,200,000

Note 1: Assumes 60 lb/bushel for Wheat and Soybeans and 56 lb/bushel for corn; therefore, 60 lb/bushel was used to calculate the maximum PTE.

Unloading/Receiving					
² Straight Truck (lb/ton)			² Hopper Truck		
PM	PM-10	PM2.5	PM	PM-10	PM2.5
0.18	0.059	0.01	0.035	0.0078	0.0013
0.142	0.047	0.008	Controlled		

Unloading/ Receiving	PM	PM10	PM2.5
Straight Truck	108.00	35.40	6.00
Hopper Truck	21.00	4.68	0.78
Total worst uncontrolled PTE	108.00	35.40	6.00
³ Controlled	85.32	27.97	4.74

Note 2: Source receives grain from both straight truck and hopper truck. All grain is conservatively assumed to be received using the methodology with the worst case emission factor.

Note 3: A control efficiency of 21% is used for the baffles which was taken from Page 4-25 of the "Background Information" of AP-42, Section 9.9.1). This corrected the 60% control efficiency in prior PTE calculations, reflected in 147-36414-00055 which has no basis and the the source does not have any baghouse or other control to consider a higher control efficiency for the baffles.

⁶ Shipping					
Truck			Barge		
PM	PM-10	PM2.5	PM	PM-10	PM2.5
0.086	0.029	0.0049	0.016	0.004	0.00055
0.043	0.0145	0.00245	0.008	0.002	0.000275
					Uncontrolled EF
					Controlled EF

Shipping	PM	PM10	PM2.5
Straight Truck	51.60	17.40	2.94
⁷ Barge	9.60	2.40	0.33
Total worst	51.60	17.40	2.94
Controlled PTE	25.80	8.70	1.47

Note 6: Source ships grain both through straight trucks and barges All grain is conservatively assumed to be shipped via straight truck.
 Note 7: The AP-42 emission factor for barge shipping was determined with spouts. Truck Loadout is with a sleeve. The spouts for barge loading and sleeve for truck loading have control efficiency of 50%. See work practices required for spouts and sleeve.

Methodology:

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03)
 Potential Emissions (ton/yr) = Throughput (ton/yr)* Emission factor (lb/ton) / 2000 (lbs/ton)
 Controlled Potential Emissions (ton/yr) = Throughput (ton/yr) * Emission factor (lb/ton) / 2000 (lbs/ton)* (1-Control Efficiency)

Drying		
PM	PM-10	PM2.5
0.22	0.055	0.0094

GRAIN DRIED THROUGHPUT LIMITS	Limited Bushes/year		Limited Grain Throughput (tons/year)
	PM	PM10	PM2.5
	25,000,000	750,000	
Drying	132.00	33.00	5.64
Total uncontrolled	82.50	20.63	3.53
PTE Limits, tons/yr			

*Headhouse and Grain Handling			
	PM	PM-10	PM2.5
Uncontrolled EF	0.061	0.034	0.0058
Controlled EF	0.0183	0.0102	0.00174
	PM	PM10	PM2.5
Total uncontrolled	109.80	61.20	10.44
Total Controlled	32.94	18.36	3.13

* The grain is handled 3 times through the internal handling system. Therefore, the PTE for the internal handling is multiplied 3x, this corrected the prior PTE calculations, which was only based on one time grain handling.

Note: All conveyors and other units used in the internal handling are enclosed According to the Air Pollution Engineering Manual (Buonicore and Davis, 1992), enclosure of material transfer points can result in particulate emissions reductions of 70% as a conservative estimate.

Storage		
PM	PM-10	PM2.5
0.025	0.0063	0.0011

storage	PM	PM10	PM2.5
uncontrolled	15.00	3.78	0.66

**Appendix A: Emissions Calculations
Permanent Storage Pile**

Company Name: ADM Grain Company
Address City IN Zip: 609 N. State Road 66, Rockport, IN 47635
SIC Code: 5153
Operating Permit Number: F147-36979-00055
Reviewer: Aida DeGuzman

Grain	bushels/year	¹ lbs / bushel	Grain Throughput (tons/year)
Grain	2,000,000	60	60,000

Note 1: Assumes 60 lb/bushel for Wheat and Soybeans and 56 lb/bushel for corn; therefore, 60 lb/bushel was used to calculate the maximum PTE.

AP-42 Emission Factor, Table 9.9.1-1					
³ Straight Truck (lb/ton)			³ Hopper Truck		
PM	PM-10	PM2.5	PM	PM-10	PM2.5
0.18	0.059	0.01	0.035	0.0078	0.0013

Grain Unloading to Permanent Storage Pile			
	PM	PM10	PM2.5
Straight Truck	5.40	1.77	0.30
Hopper Truck	1.05	0.23	0.04
Total worst uncontrolled	5.40	1.77	0.30

Grain from Permanent Storage Pile Loading into Trucks, Using Loaders			
	PM	PM10	PM2.5
Grain from Permanent Storage Pile Loading into Trucks	5.40	1.77	0.30
Uncontrolled PTE	5.40	1.77	0.30
Total Uncontrolled PTE	10.80	3.54	0.60

The permanent storage pile will not increase the source's throughput of 40,000,000 bushels per year. Therefore, no additional emissions will result when the grain from the storage pile is dumped from trucks into the dump pits and processed into the internal handling system and loaded out for shipping.
 Note: This is a PTE re-calculation of the temporary storage pile, which is now made into permanent storage pile.

Methodology

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03)
 Potential Emissions (ton/yr) = Throughput (ton/yr)* Emission factor (lb/ton) / 2000 (lbs/ton)
 Controlled Potential Emissions (ton/yr) = Throughput (ton/yr) * Emission factor (lb/ton) / 2000 (lbs/ton)* (1-Control Efficiency)

TSD Appendix A: Emission Calculations

Company Name: ADM Grain Company
Source Address: 609 N. State Road 66, Rockport, IN 47635
Permit No.: M147-28763-00055
Operating Permit Issuance Date: 3/30/2010
Administrative Amendment No.: 147-36414-00055

Material Storage Piles (AP-42 Section 11.2.3)

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

$$E_f = 1.7 * (s/1.5) * (365-p) / 235 * (f/15)$$

where E_f = emission factor (lb/acre/day)

s = silt content (wt %)

p = 125 days of rain greater than or equal to 0.01 inches

f = 15 % of wind greater than or equal to 12 mph

Storage Pile*	Materials	Worst Case Silt Content (wt %)	Emission Factor (lb/acre/day)	Maximum Anticipated Pile Size (acres)	Unlimited PTE of PM (Before Control) (tons/yr)	Unlimited PTE of PM10/PM2.5 (Before Control) (tons/yr)
Open Rectangular Storage Area	grain	4.6	5.32	0.25	0.243	0.085
Totals PTE =					0.24	0.09

Methodology

Maximum pile size (acres) provided by the source

The grain dumped on the ground storage pile will remain uncovered by tarp until it is fully filled. Therefore, fugitive emissions will result due to wind erosion. When fully filled the tarp will be laid on top touching the grain.

Unlimited PTE of PM (tons/yr) = (Emission Factor (lb/acre/day)) * (Maximum Pile Size (acres)) * (ton/2000 lbs) * (8760 hours/yr)

Unlimited PTE of PM10 (tons/yr) = (Potential PM Emissions (tons/yr)) * 35%

*Worst case silt content values are from AP-42 Table 13.2.4-1 (dated 11/2006):

- Open Rectangular Storage Area: materials silt content using coal at a iron and steel production facility

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

Company Name: ADM Grain Company
Address City IN Zip: 609 N. State Road 66, Rockport, IN 47635
SIC Code: 5153
Operating Permit Number: F147-36979-00055
Reviewer: Aida DeGuzman

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	90.0	1.0	90.0	40.0	3600.0	1848	0.350	31.5	11497.5
Vehicle (leaving plant) (one-way trip)	90.0	1.0	90.0	40.0	3600.0	1848	0.350	31.5	11497.5
Total			180.0		7200.0			63.0	22995.0

Average Vehicle Weight Per Trip = $\frac{40.0}{1.0}$ tons/trip
 Average Miles Per Trip = $\frac{0.35}{1.0}$ miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	6.4	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2)
W =	40.0	40.0	40.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

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

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	8.28	2.11	0.27	lb/mile
Mitigated Emission Factor, $E_{ext} =$	5.44	1.39	0.18	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	47.58	12.13	1.57	31.29	7.97	1.03	15.64	3.99	0.52
Vehicle (leaving plant) (one-way trip)	47.58	12.13	1.57	31.29	7.97	1.03	15.64	3.99	0.52
Total	95.16	24.25	3.14	62.57	15.95	2.07	31.29	7.97	1.03

Methodology

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

Abbreviations

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only MM BTU/HR <100

Company Name: ADM Grain Company
Address City IN Zip: 609 N. State Road 66, Rockport, IN 47635
SIC Code: 5153
Operating Permit Number: F147-36979-00055
Reviewer: Aida DeGuzman

Heat Input Capacity		HHV mmBtu	Potential Throughput MMCF/yr
MMBtu/hr	Emission Unit	mmscf	
41.6	Dryer	1020	357.3

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.3	1.4	1.4	0.1	17.9	1.0	15.0
Potential Emission in lb/hr	0.1	0.3	0.3				

*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.

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

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

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.751E-04	2.144E-04	1.340E-02	3.215E-01	6.074E-04	3.361E-01

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	8.932E-05	1.965E-04	2.501E-04	6.788E-05	3.751E-04	9.789E-04

Methodology is the same as above.

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

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

Total HAPs	0.34
Worst HAP	0.32
Worst HAP	Hexane

Company Name: ADM Grain Company
Address City IN Zip: 609 N. State Road 66, Rockport, IN 47635
SIC Code: 5153
Operating Permit Number: F147-36979-00055
Reviewer: Aida DeGuzman

Allowable Emissions Under 326 IAC 6-3-2

Emissions Unit Description	Maximum (bushels/hr) for each unit of that type	Maximum Process Weight (tons/hr) for each unit of that type	PM Emission Factor (lbs/ton)	Control Efficiency (%)	PM Emissions Before Control (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr) for each unit of that type	PM Emissions After Control (lbs/hr)	Control required for Compliance ? Yes/No	Remarks (Yes - in Compliance, No - Not in Compliance)
Dump #1	18,000	540	0.18	21%	97.2	69.9	76.8	Yes	No
River Dump #2	45,000	1,350	0.18	21%	243.0	81.5	192.0	Yes	No
River Dump #3	45,000	1,350	0.18	21%	243.0	81.5	192.0	Yes	No
Dump #2	18,000	540	0.18	21%	97.2	69.9	76.8	Yes	No
Dump #1 Drag Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Receiving Leg #1	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Bin 10 Reclaim Conveyor	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 20 Reclaim	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 30 Reclaim	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 15 Reclaim	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 25 Reclaim	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 25 Fill Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Dump #2 Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Receiving Leg #2	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Grain Distributor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Bin 26 Reclaim Conveyor	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 26 Fill Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Bin 35 Reclaim Conveyor	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 35 Fill Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Shipping Conveyor (River Hi Roller)	45,000	1,350	0.016	50%	21.6	81.5	10.8	No	Yes
Barge Conveyor (River Belt)	50,000	1,500	0.016	50%	24.0	83.0	12.0	No	Yes
Barge Loadout Spout	50,000	1,500	0.016	50%	24.0	83.0	12.0	No	Yes
Bin 20 Sidedraw Truck	8,000	240	0.029	50%	7.0	60.5	3.5	No	Yes
Leg Spout Truck Loadout	18,000	540	0.029	50%	15.7	69.9	7.8	No	Yes
Bin 15 Sidedraw Truck	8,000	240	0.029	50%	7.0	60.5	3.5	No	Yes
Bin 25 Sidedraw Truck	8,000	240	0.029	50%	7.0	60.5	3.5	No	Yes
Bin 10 Sidedraw Truck	8,000	240	0.029	50%	7.0	60.5	3.5	No	Yes
Grain Dryer	4,000	120	0.22	N/A	26.4	53.1	26.4	No	Yes
Wet Drag	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes
Bottom Dry Drag	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes
Top Dry Drag	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes
Wet Leg	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes
Dry Leg	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes

The baffles control efficiency of 21% corrected the 60% used in previous permits. The 70% control efficiency for the internal handling corrected the 99%, and the loadout control efficiency of 50% corrected the 90%. See detailed explanation fo the change in tab "Grain Handling -Limits" on PTE calculation spreadsheet on page 3 of 9 TSD App A.
 The units highlighted in yellow are enclosed conveyors with 70% control efficiency.

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate is in excess of sixty thousand pounds per hour (30 tons/hr):

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

where

E = rate of emission in pounds per

P = process weight rate in tons per hour

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (4/03)

Methodology

Maximum Grain Throughput (tons/hr) = Maximum Grain Throughput (bushels/hr) x 60 (lbs/bushel) x 1 ton/2000 lbs

PTE of PM/PM₁₀ Before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton)

PTE of PM/PM₁₀ After Control (tons/yr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton) x (1- Control Efficiency (%))

Company Name: ADM Grain Company
Address City IN Zip: 609 N. State Road 66, Rockport, IN 47635
SIC Code: 5153
Operating Permit Number: F147-36979-00055
Reviewer: Aida DeGuzman

Allowable Emissions Under 326 IAC 6-3-2

Emissions Unit Description	Maximum (bushels/hr) for each unit of that type	Maximum Process Weight (tons/hr) for each unit of that type	PM Emission Factor (lbs/ton)	Control Efficiency (%)	PM Emissions Before Control (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr) for each unit of that type	PM Emissions After Control (lbs/hr)	Control required for Compliance ? Yes/No	Remarks (Yes - in Compliance, No - Not in Compliance)
Grain Receiving Using Combination of Straight Trucks and Hopper Trucks in each Dump Station to Meet 326 IAC 6-3-2									
Dump #1 - Trucks	18,000	475	0.18	21%	85.5	68.3	67.5	Yes	Yes
Dump#1 - Hopper Trucks		65	0.035	21%	2.3	47.1	1.8	No	Yes
River Dump #2 - Trucks	45,000	475	0.18	21%	85.5	68.3	67.5	Yes	Yes
River Dump #2 - Hopper Trucks		875	0.035	21%	30.6	75.9	24.2	Yes	Yes
River Dump #3 - Trucks	45,000	475	0.18	21%	85.5	68.3	67.5	Yes	Yes
River Dump #3 - Hopper Trucks		875	0.035	21%	30.6	75.9	24.2	No	Yes
Dump #2 - Trucks	18,000	475	0.18	21%	85.5	68.3	67.5	Yes	Yes
Dump #2 - Hopper Trucks		65	0.035	21%	2.3	47.1	1.8		
Pit 0 - Trucks	50,000	475	0.18	21%	85.5	68.3	67.5	Yes	Yes
Pit 0 - Hopper Trucks		1,025	0.035	21%	35.9	77.9	28.3	No	
Dump #1 Drag Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Receiving Leg #1	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Bin 10 Reclaim Conveyor	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 20 Reclaim	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 30 Reclaim	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 15 Reclaim	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 25 Reclaim	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 25 Fill Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Dump #2 Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Receiving Leg #2	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Grain Distributor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Bin 26 Reclaim Conveyor	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 26 Fill Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Bin 35 Reclaim Conveyor	20,000	600	0.061	70%	36.6	71.2	11.0	No	Yes
Bin 35 Fill Conveyor	18,000	540	0.061	70%	32.9	69.9	9.9	No	Yes
Shipping Conveyor (River Hi Roller)	45,000	1,350	0.016	50%	21.6	81.5	10.8	No	Yes
Barge Conveyor (River Belt)	50,000	1,500	0.016	50%	24.0	83.0	12.0	No	Yes
Barge Loadout Spout	50,000	1,500	0.016	50%	24.0	83.0	12.0	No	Yes
Bin 20 Sidedraw Truck	8,000	240	0.029	50%	7.0	60.5	3.5	No	Yes
Leg Spout Truck Loadout	18,000	540	0.029	50%	15.7	69.9	7.8	No	Yes
Bin 15 Sidedraw Truck	8,000	240	0.029	50%	7.0	60.5	3.5	No	Yes
Bin 25 Sidedraw Truck	8,000	240	0.029	50%	7.0	60.5	3.5	No	Yes
Bin 10 Sidedraw Truck	8,000	240	0.029	50%	7.0	60.5	3.5	No	Yes
Grain Dryer	4,000	120	0.22	N/A	26.4	53.1	26.4	No	Yes
Wet Drag	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes
Bottom Dry Drag	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes
Top Dry Drag	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes
Wet Leg	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes
Dry Leg	6,500	195	0.061	N/A	11.9	58.2	11.9	No	Yes

The baffles control efficiency of 21% corrected the 60% used in previous permits. The 70% control efficiency for the internal corrected the 99%, and the loadout control efficiency of 50% corrected the 90%. See detailed explanation for the change in tab "Grain Handling -Limits" on PTE calculation spreadsheet on page 3 of 9 TSD App A. The units highlighted in yellow are enclosed conveyors with 70% control efficiency.

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate is in excess of sixty thousand pounds per hour (30 tons/hr):

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

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

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (4/03)

Methodology

Maximum Grain Throughput (tons/hr) = Maximum Grain Throughput (bushels/hr) x 60 (lbs/bushel) x 1 ton/2000 lbs
 PTE of PM/PM₁₀ Before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton)
 PTE of PM/PM₁₀ After Control (tons/yr) = Maximum Throughput (tons/hr) x Emission factor (lbs/ton) x (1- Control Efficiency (%))



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 5, 2016

Ms. Karena Musgrave
ADM Grain Company
4666 Faries Parkway
Decatur, Illinois 62526

Re: Public Notice
ADM Grain Company
Permit Level: FESOP- Transition from MSOP
Permit Number: 147-36979-00055

Dear Ms. Musgrave:

Enclosed is a copy of your draft FESOP – Transition from MSOP, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that The Journal Democrat in Rockport, Indiana publish the abbreviated version of the public notice no later than August 11, 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 Spencer County Public Library, 210 Walnut Street in Rockport, 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 Aida DeGuzman, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-2251 or dial (317) 234-2251.

Sincerely,

Vicki Biddle

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 5, 2016

The Journal Democrat
P. O. Box 6
Rockport, Indiana 47635

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for ADM Grain Company, Spencer 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 11, 2016.

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

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

Vicki Biddle

Vicki Biddle
Permit Branch
Office of Air Quality

Permit Level: FESOP – Transition from MSOP
Permit Number: 147-36979-00055

Enclosure

PN Newspaper.dot 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 5, 2016

To: Spencer 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: ADM Grain Company
Permit Number: 147-36979-00055

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 2/16/2016



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

August 5, 2016
ADM Grain Company
147-36979-00055

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 2/17/2016

Mail Code 61-53

IDEM Staff	VBIDDLE 8/8/2016 ADM Grain Company 147-36979-00055 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Karena Musgrave ADM Grain Company 4666 Faries Parkway Decatur IL 62526 (Source CAATS)										
2		Paul Wujek Director ADM Grain Company 4666 Faries Parkway Decatur IL 62526 (RO CAATS)										
3		Ms. Francis Lueken 223 W. 10th Street, P.O. Box 206 Ferdinand IN 47532 (Affected Party)										
4		Rockport City Council and Mayors Office P.O. Box 151 Rockport IN 47635 (Local Official)										
5		Spencer Co Public Library 210 N Walnut St Rockport IN 47635-1398 (Library)										
6		Ms. Kathy Tretter Dubois-Spencer Counties Publishing Co, Inc P.O. Box 38 Ferdinand IN 47532-0038 (Affected Party)										
7		Spencer County Commissioners 200 Main St., Courthouse Rockport IN 47635 (Local Official)										
8		Spencer County Health Department Main Street Courthouse, 1st Floor, Room 1 Rockport IN 47635-1492 (Health Department)										
9		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)										
10		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)										
11		John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
12												
13												
14												
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