



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Minor Source Operating Permit (MSOP)

for Cargill, Inc. in Vanderburgh County

MSOP Renewal No.: M163-37380-00039

The Indiana Department of Environmental Management (IDEM) has received an application from Cargill, Inc. located at 2000 West Ohio Street, Evansville, IN 47712 for a renewal of its MSOP issued on February 17, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Cargill, Inc. to continue to operate its existing source.

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

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

Willard Library
21 First Avenue
Evansville, IN 47710

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 M163-37380-00039 in all correspondence.

Comments should be sent to:

Bryce Hill
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5952
Or dial directly: (317) 234-5952
Fax: (317) 232-6749 attn: Bryce Hill
E-mail: bhill3@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 Bryce Hill of my staff at the above address.



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



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

DRAFT

Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Cargill, Inc.
2000 West Ohio Street
Evansville, Indiana 47712

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M163-37380-00039	
Issued by:	Issuance Date:
Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Expiration Date:

TABLE OF CONTENTS

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS 18

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]..... 20

 D.1.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2]

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

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)] 21

 D.1.3 Particulate Control

 D.1.4 Broken or Failed Bag Detection

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]..... 22

 D.1.5 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]..... 22

 D.1.6 Record Keeping Requirements

ANNUAL NOTIFICATION 23

MALFUNCTION REPORT 24

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary grain elevator with a permanent storage capacity of 1.8 million bushels.

Source Address:	2000 West Ohio Street, Evansville, Indiana 47712
General Source Phone Number:	812-424-2432
SIC Code:	5153 (Grain and Field Beans)
County Location:	Vanderburgh
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

Grain Receiving and Handling

- (a) One (1) truck receiving dump pit, identified as Truck Pit, constructed in 1981, with a maximum receiving throughput of 900 tons per hour (30,000 bushels per hour at 60 pounds per bushel), with particulate emissions controlled by Baghouse #1.
- (b) One (1) enclosed internal grain handling operation, constructed in 1982, with a maximum throughput of 900 tons per hour (30,000 bushels per hour at 60 pounds per bushel), and a maximum annual throughput of 428,400 tons per year (14,280,000 bushels per year at 60 pounds per bushel), with particulate emissions controlled by Baghouse #1, consisting of the following equipment:
 - (1) One (1) enclosed truck dump receiving belt conveyor, identified as BC 201, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (2) One (1) enclosed bucket conveyor, identified as Leg 31, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (3) One (1) enclosed drag conveyor, identified as DC 202, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (4) One (1) enclosed headhouse distributor, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (5) One (1) enclosed belt conveyor for filling Bin 500, identified as BC 211, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.

- (6) One (1) enclosed drag conveyor for filling Bin 400, identified as DC 203, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
- (7) One (1) enclosed reclaim conveyor for Bin 500, identified as BC 212, constructed in 1982, with a maximum throughput of 35,000 bushels per hour.
- (8) One (1) enclosed reclaim conveyor for Bin 400, identified as BC 205, constructed in 1982, with a maximum throughput of 35,000 bushels per hour.
- (9) One (1) enclosed belt conveyor, identified as BC 204, constructed in 1982, with a maximum throughput of 35,000 bushels per hour.
- (10) One (1) enclosed belt conveyor for barge loading, identified as BC 206, constructed in 1982, with a maximum throughput of 35,000 bushels per hour.
- (11) One (1) enclosed drag conveyor for truck loading, identified as DC 214, constructed in 1982, with a maximum throughput of 20,000 bushels per hour.
- (12) One (1) enclosed screw conveyor, identified as SC 207, constructed in 1982, with a maximum throughput of 3,000 bushels per hour.
- (13) One (1) enclosed screw conveyor, identified as SC 208, constructed in 1982, with a maximum throughput of 3,000 bushels per hour.
- (14) One (1) enclosed bucket conveyor, identified as Leg 32, constructed in 1982, with a maximum throughput of 6,000 bushels per hour.
- (15) One (1) enclosed screw conveyor, identified as SC 209, constructed in 1982, with a maximum throughput of 3,000 bushels per hour.
- (16) One (1) enclosed bucket conveyor, identified as Leg 33, constructed in 1982, with a maximum throughput of 6,000 bushels per hour.
- (17) One (1) enclosed drag conveyor, identified as DC 213, constructed in 1982, with a maximum throughput of 6,000 bushels per hour.
- (18) One (1) enclosed screw conveyor, identified as SC 210, constructed in 1982, with a maximum throughput of 3,000 bushels per hour.

Grain Drying

- (c) One (1) natural gas fired column grain dryer, identified as Dryer, constructed in 1981, with a maximum heat input capacity of 30 million (MM) British thermal units (Btu) per hour, processing grain at a maximum capacity of 50 tons per hour (1680 bushels per hour at 60 pounds per bushel), with particulate emissions controlled by an air recirculation system, exhausting through the column wall perforations;

Grain Storage

- (d) Nine (9) storage bins, each with a maximum throughput of 900 tons per hour (30,000 bushels per hour at 60 pounds per bushel), consisting of the following:

Note: Grain is treated with mineral oil or soybean oil as a dust suppressant prior to being transferred to the storage bins.

- (1) One (1) storage bin, identified as Tank 500, constructed in 1982, with a maximum capacity of 1,000,000 bushels, and with particulate emissions controlled by Baghouse #1.
- (2) One (1) storage bin, identified as Tank 400, constructed in 1981, with a maximum capacity of 500,000 bushels, and with particulate emissions controlled by Baghouse #1.
- (3) Four (4) storage bins, identified as Bins 602, 604, 605, and 606, each constructed in 1981, each with a maximum capacity of 50,000 bushels, and with particulate emissions controlled by Baghouse #1.
- (4) Two (2) storage bins, identified as Bins 601 and 603, each constructed in 1981, and each with a maximum capacity of 50,000 bushels.
- (5) One (1) surge tank, identified as Tank 700, constructed in 1982, with a maximum capacity of 3,500 bushels.

Grain Shipping

- (e) One (1) truck (or rail) loading spout, identified as DC 214, constructed in 1982, with a maximum throughput of 600 tons per hour (20,000 bushels per hour at 60 pounds per bushel), with particulate emissions controlled by Baghouse #1.
- (f) One (1) barge loading spout, identified as Barge Load-Out, constructed in 1981, with a maximum throughput of 1,050 tons per hour (35,000 bushels per hour at 60 pounds per bushel), and with particulate emissions controlled by Baghouse #2.
- (g) Receiving and shipping of grain by paved roads.

Storage Tanks

- (h) One (1) mineral oil or soybean oil storage tank, constructed in 2000, with a maximum storage capacity of 5000 gallons.
- (i) One (1) mineral oil or soybean oil storage tank, constructed in 1990, with a maximum storage capacity of 2000 gallons.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M163-37380-00039, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

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

The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M163-37380-00039 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

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

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

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

C.7 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

C.10 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

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

Corrective Actions and Response Steps

C.11 Response to Excursions or Exceedances

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

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

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

C.13 Malfunctions Report [326 IAC 1-6-2]

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

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

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

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

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

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Grain Receiving and Handling

- (a) One (1) truck receiving dump pit, identified as Truck Pit, constructed in 1981, with a maximum receiving throughput of 900 tons per hour (30,000 bushels per hour at 60 pounds per bushel), with particulate emissions controlled by Baghouse #1.
- (b) One (1) enclosed internal grain handling operation, constructed in 1982, with a maximum throughput of 900 tons per hour (30,000 bushels per hour at 60 pounds per bushel), and a maximum annual throughput of 428,400 tons per year (14,280,000 bushels per year at 60 pounds per bushel), with particulate emissions controlled by Baghouse #1, consisting of the following equipment:
 - (1) One (1) enclosed truck dump receiving belt conveyor, identified as BC 201, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (2) One (1) enclosed bucket conveyor, identified as Leg 31, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (3) One (1) enclosed drag conveyor, identified as DC 202, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (4) One (1) enclosed headhouse distributor, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (5) One (1) enclosed belt conveyor for filling Bin 500, identified as BC 211, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (6) One (1) enclosed drag conveyor for filling Bin 400, identified as DC 203, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (7) One (1) enclosed reclaim conveyor for Bin 500, identified as BC 212, constructed in 1982, with a maximum throughput of 35,000 bushels per hour.
 - (8) One (1) enclosed reclaim conveyor for Bin 400, identified as BC 205, constructed in 1982, with a maximum throughput of 35,000 bushels per hour.
 - (9) One (1) enclosed belt conveyor, identified as BC 204, constructed in 1982, with a maximum throughput of 35,000 bushels per hour.
 - (10) One (1) enclosed belt conveyor for barge loading, identified as BC 206, constructed in 1982, with a maximum throughput of 35,000 bushels per hour.
 - (11) One (1) enclosed drag conveyor for truck loading, identified as DC 214, constructed in 1982, with a maximum throughput of 20,000 bushels per hour.
 - (12) One (1) enclosed screw conveyor, identified as SC 207, constructed in 1982, with a maximum throughput of 3,000 bushels per hour.

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

Emissions Unit Description (continued):

- (13) One (1) enclosed screw conveyor, identified as SC 208, constructed in 1982, with a maximum throughput of 3,000 bushels per hour.
- (14) One (1) enclosed bucket conveyor, identified as Leg 32, constructed in 1982, with a maximum throughput of 6,000 bushels per hour.
- (15) One (1) enclosed screw conveyor, identified as SC 209, constructed in 1982, with a maximum throughput of 3,000 bushels per hour.
- (16) One (1) enclosed bucket conveyor, identified as Leg 33, constructed in 1982, with a maximum throughput of 6,000 bushels per hour.
- (17) One (1) enclosed drag conveyor, identified as DC 213, constructed in 1982, with a maximum throughput of 6,000 bushels per hour.
- (18) One (1) enclosed screw conveyor, identified as SC 210, constructed in 1982, with a maximum throughput of 3,000 bushels per hour.

Grain Drying

- (c) One (1) natural gas fired column grain dryer, identified as Dryer, constructed in 1981, with a maximum heat input capacity of 30 million (MM) British thermal units (Btu) per hour, processing grain at a maximum capacity of 50 tons per hour (1680 bushels per hour at 60 pounds per bushel), with particulate emissions controlled by an air recirculation system, exhausting through the column wall perforations;

Grain Storage

- (d) Nine (9) storage bins, each with a maximum throughput of 900 tons per hour (30,000 bushels per hour at 60 pounds per bushel), consisting of the following:
 - Note: Grain is treated with mineral oil or soybean oil as a dust suppressant prior to being transferred to the storage bins.
 - (1) One (1) storage bin, identified as Tank 500, constructed in 1982, with a maximum capacity of 1,000,000 bushels, and with particulate emissions controlled by Baghouse #1.
 - (2) One (1) storage bin, identified as Tank 400, constructed in 1981, with a maximum capacity of 500,000 bushels, and with particulate emissions controlled by Baghouse #1.
 - (3) Four (4) storage bins, identified as Bins 602, 604, 605, and 606, each constructed in 1981, each with a maximum capacity of 50,000 bushels, and with particulate emissions controlled by Baghouse #1.
 - (4) Two (2) storage bins, identified as Bins 601 and 603, each constructed in 1981, and each with a maximum capacity of 50,000 bushels.
 - (5) One (1) surge tank, identified as Tank 700, constructed in 1982, with a maximum capacity of 3,500 bushels.

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

Emissions Unit Description (continued):

Grain Shipping

- (e) One (1) truck (or rail) loading spout, identified as DC 214, constructed in 1982, with a maximum throughput of 600 tons per hour (20,000 bushels per hour at 60 pounds per bushel), with particulate emissions controlled by Baghouse #1.
- (f) One (1) barge loading spout, identified as Barge Load-Out, constructed in 1981, with a maximum throughput of 1,050 tons per hour (35,000 bushels per hour at 60 pounds per bushel), and with particulate emissions controlled by Baghouse #2.

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

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

D.1.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2]

- (a) Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from each grain receiving, handling, drying, storage, and shipping facility shall not exceed 0.03 grains per dry standard cubic foot (dscf).
- (b) Pursuant to 326 IAC 6.5-1-2(d)(2), the Permittee shall comply with the following for operations associated with the grain elevator:

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

- (1) Housekeeping practices shall be conducted as follows:
 - (A) Areas to be swept and maintained shall include, at a minimum, the following:
 - (i) General grounds, yard, and other open areas.
 - (ii) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
 - (iii) Grain driers with respect to accumulated particulate matter.
 - (B) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (C) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
- (2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (A) Malfunctions.

- (B) Breakdowns.
 - (C) Improper adjustment.
 - (D) Operating above the rated or designed capacity.
 - (E) Not following designed operating specifications.
 - (F) Lack of good preventive maintenance care.
 - (G) Lack of critical and proper spare replacement parts on hand.
 - (H) Lack of properly trained and experienced personnel.
- (3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

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

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

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

D.1.3 Particulate Control

- (a) In order to comply with Condition D.1.1, the baghouses and the air recirculation system associated with the emission units listed above for particulate control shall be in operation and control emissions from their respective emission units at all times these facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.4 Broken or Failed Bag Detection

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

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

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

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhausts from Baghouse #1 and Baghouse #2, and the grain dryer column wall perforations from the air recirculation system shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5 – Visible Emission Notation, the Permittee shall maintain records of daily visible emission notations of the stack exhausts from Baghouse #1 and Baghouse #2, and the grain dryer column wall perforations from the air recirculation system. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Cargill, Inc.
Address:	2000 West Ohio Street
City:	Evansville, Indiana 47712
Phone #:	812-424-2432
MSOP #:	M163-37380-00039

I hereby certify that Cargill, Inc. is :

still in operation.

I hereby certify that Cargill, Inc. is :

no longer in operation.

in compliance with the requirements of MSOP M163-37380-00039.

not in compliance with the requirements of MSOP M163-37380-00039.

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	Cargill, Inc.
Source Location:	2000 W. Ohio Street, Evansville, Indiana 47712
County:	Vanderburgh
SIC Code:	5153 (Grain and Field Beans)
Permit Renewal No.:	M163-37380-00039
Permit Reviewer:	Bryce Hill

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Cargill, Inc. relating to the operation of a stationary grain elevator, with a permanent storage capacity of 1.8 million bushels. On July 6, 2016, Cargill, Inc. submitted an application to the OAQ requesting to renew its operating permit. Cargill, Inc. was issued its first MSOP M163-31047-00039 on February 17, 2012.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

Grain Receiving and Handling

- (a) One (1) truck receiving dump pit, identified as Truck Pit, constructed in 1981, with a maximum receiving throughput of 900 tons per hour (30,000 bushels per hour at 60 pounds per bushel), with particulate emissions controlled by Baghouse #1.
- (b) One (1) enclosed internal grain handling operation, constructed in 1982, with a maximum throughput of 900 tons per hour (30,000 bushels per hour at 60 pounds per bushel), and a maximum annual throughput of 428,400 tons per year (14,280,000 bushels per year at 60 pounds per bushel), with particulate emissions controlled by Baghouse #1, consisting of the following equipment:
 - (1) One (1) enclosed truck dump receiving belt conveyor, identified as BC 201, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (2) One (1) enclosed bucket conveyor, identified as Leg 31, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (3) One (1) enclosed drag conveyor, identified as DC 202, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (4) One (1) enclosed headhouse distributor, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (5) One (1) enclosed belt conveyor for filling Bin 500, identified as BC 211, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (6) One (1) enclosed drag conveyor for filling Bin 400, identified as DC 203, constructed in 1982, with a maximum throughput of 30,000 bushels per hour.
 - (7) One (1) enclosed reclaim conveyor for Bin 500, identified as BC 212, constructed in 1982, with a maximum throughput of 35,000 bushels per hour.

- (8) One (1) enclosed reclaim conveyor for Bin 400, identified as BC 205, constructed in 1982, with a maximum throughput of 35,000 bushels per hour.
- (9) One (1) enclosed belt conveyor, identified as BC 204, constructed in 1982, with a maximum throughput of 35,000 bushels per hour.
- (10) One (1) enclosed belt conveyor for barge loading, identified as BC 206, constructed in 1982, with a maximum throughput of 35,000 bushels per hour.
- (11) One (1) enclosed drag conveyor for truck loading, identified as DC 214, constructed in 1982, with a maximum throughput of 20,000 bushels per hour.
- (12) One (1) enclosed screw conveyor, identified as SC 207, constructed in 1982, with a maximum throughput of 3,000 bushels per hour.
- (13) One (1) enclosed screw conveyor, identified as SC 208, constructed in 1982, with a maximum throughput of 3,000 bushels per hour.
- (14) One (1) enclosed bucket conveyor, identified as Leg 32, constructed in 1982, with a maximum throughput of 6,000 bushels per hour.
- (15) One (1) enclosed screw conveyor, identified as SC 209, constructed in 1982, with a maximum throughput of 3,000 bushels per hour.
- (16) One (1) enclosed bucket conveyor, identified as Leg 33, constructed in 1982, with a maximum throughput of 6,000 bushels per hour.
- (17) One (1) enclosed drag conveyor, identified as DC 213, constructed in 1982, with a maximum throughput of 6,000 bushels per hour.
- (18) One (1) enclosed screw conveyor, identified as SC 210, constructed in 1982, with a maximum throughput of 3,000 bushels per hour.

Grain Drying

- (c) One (1) natural gas fired column grain dryer, identified as Dryer, constructed in 1981, with a maximum heat input capacity of 30 million (MM) British thermal units (Btu) per hour, processing grain at a maximum capacity of 50 tons per hour (1680 bushels per hour at 60 pounds per bushel), with particulate emissions controlled by an air recirculation system, exhausting through the column wall perforations;

Grain Storage

- (d) Nine (9) storage bins, each with a maximum throughput of 900 tons per hour (30,000 bushels per hour at 60 pounds per bushel), consisting of the following:

Note: Grain is treated with mineral oil or soybean oil as a dust suppressant prior to being transferred to the storage bins.

- (1) One (1) storage bin, identified as Tank 500, constructed in 1982, with a maximum capacity of 1,000,000 bushels, and with particulate emissions controlled by Baghouse #1.

- (2) One (1) storage bin, identified as Tank 400, constructed in 1981, with a maximum capacity of 500,000 bushels, and with particulate emissions controlled by Baghouse #1.
- (3) Four (4) storage bins, identified as Bins 602, 604, 605, and 606, each constructed in 1981, each with a maximum capacity of 50,000 bushels, and with particulate emissions controlled by Baghouse #1.
- (4) Two (2) storage bins, identified as Bins 601 and 603, each constructed in 1981, and each with a maximum capacity of 50,000 bushels.
- (5) One (1) surge tank, identified as Tank 700, constructed in 1982, with a maximum capacity of 3,500 bushels.

Grain Shipping

- (e) One (1) truck (or rail) loading spout, identified as DC 214, constructed in 1982, with a maximum throughput of 600 tons per hour (20,000 bushels per hour at 60 pounds per bushel), with particulate emissions controlled by Baghouse #1.
- (f) One (1) barge loading spout, identified as Barge Load-Out, constructed in 1981, with a maximum throughput of 1,050 tons per hour (35,000 bushels per hour at 60 pounds per bushel), and with particulate emissions controlled by Baghouse #2.
- (g) Receiving and shipping of grain by paved roads.

Storage Tanks

- (h) One (1) mineral oil or soybean oil storage tank, constructed in 2000, with a maximum storage capacity of 5000 gallons.
- (i) One (1) mineral oil or soybean oil storage tank, constructed in 1990, with a maximum storage capacity of 2000 gallons.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no unpermitted emission units operating at this source during this review process.

Existing Approvals

The source was issued MSOP No. M163-31047-00039 on February 17, 2012. There have been no subsequent approvals issued.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Attainment effective October 27, 2011, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

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

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Vanderburgh County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, 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**
Vanderburgh County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	173.70
PM ₁₀	59.77
PM _{2.5}	11.36
SO ₂	0.08
NO _x	12.88
VOC	0.71
CO	10.82
Single HAP	0.23 Hexane
Total HAP	0.24

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

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

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated pollutants is less than 100 tons per year. However, PM₁₀ is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.
- (b) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60.300, Subpart DD, are still not included in the permit for the emission units constructed after August 3, 1978, because this grain elevator does not have a permanent storage capacity of more than 2.5 million bushels [40 CFR 60.300(a) and 40 CFR 60.301(c)]. This grain elevator has a permanent storage capacity of 1.8 million bushels.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (d) 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.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 (Prevention of Significant Deterioration)

The source which was constructed in 1982, is not subject to the requirements of 326 IAC 2-2 because the potential to emit of all criteria pollutants are less than two hundred fifty (250) tons per year and there have been no major modifications to the source. Therefore, this source is a minor source, pursuant to 326 IAC 2-2.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This source is subject to 326 IAC 6.5 because it is located in Vanderburgh County, its PM PTE (or limited PM PTE) is equal to or greater than 100 tons/year or actual emissions are greater than 10 tons/year. However, this source is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Therefore, 326 IAC 6.5-1-2(a) applies to the grain receiving, handling, drying, storage, and shipping facility and 326 IAC 6.5-1-2(d)(2) applies to the grain elevator.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

As a result of a re-evaluation of the source's fugitive emissions, the following rule is no longer applicable to the source. This change makes a fugitive dust control plan no longer required for this

renewal. Pursuant to 326 IAC 6-5, the source has fugitive particulate emissions of less than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

State Rule Applicability – Individual Facilities

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

- (a) Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from each grain receiving, handling, drying, storage, and shipping facility shall not exceed 0.03 grains per dry standard cubic foot (dscf).
- (b) Pursuant to 326 IAC 6.5-1-2(d)(2), the Permittee shall comply with the following for operations associated with the grain elevator:

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

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

Pursuant to 326 IAC 6-3-1(c)(3), 326 IAC 6-3-2 does not apply if a particulate limitation established in 326 IAC 6.5 is more stringent than the particulate limitation established in 326 IAC 6-3-2. Since the particulate limitations established by 326 IAC 6.5-1-2 for each grain receiving, handling, drying, storage, and shipping facility are more stringent than the particulate limitations that would be established by 326 IAC 6-3-2, the grain receiving, handling, drying, storage, and shipping facilities are not subject to the requirements of 326 IAC 6-3-2.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The natural gas-fired dryer is not subject to 326 IAC 326 IAC 7-1.1 because its SO₂ PTE (or limited SO₂ PTE) is less than 25 tons per year or 10 pounds per hour.

Compliance Determination and Monitoring Requirements

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

Control	Parameter	Frequency	Excursions and Exceedances	Range
Truck Pit, Internal Grain Handling Operations, Tank 500 and 400, Bins 602, 604, 605, and 606, and Loading Spout DC 214	Visible Emissions	Daily	Response Steps	Normal-Abnormal
Barge Load-Out Spout	Visible Emissions	Daily	Response Steps	Normal-Abnormal
Grain Dryer	Visible Emissions	Daily	Response Steps	Normal-Abnormal

These monitoring conditions are necessary because Baghouse #1, Baghouse #2, and the air recirculation system must operate properly at all times their respective facilities are in operation to ensure compliance with 326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County) limits.

Recommendation

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

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

An application for the purposes of this review was received on July 6, 2016.

Conclusion

The operation of this stationary grain elevator shall be subject to the conditions of the attached MSOP Renewal No. 163-37380-00039.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Bryce Hill at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5952 or toll free at 1-800-451-6027 extension 4-5952.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
Emission Summary**

Company Name: Cargill, Inc.
Source Address: 2000 W. Ohio Street, Evansville, IN 47712
Permit Number: M163-37380-00039
Reviewer: Bryce Hill

Uncontrolled Potential to Emit (tons/year)									
Process/emission unit	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Grain Handling, Storage and Drying Processes	148.65	53.83	9.17	-	-	-	-	-	-
Column Dryer, combustion	0.24	0.98	0.98	0.08	12.88	0.71	10.82	0.24	0.23 Hexane
Fugitive Emissions - Paved Roads	24.80	4.96	1.22	-	-	-	-	-	-
Totals	173.70	59.77	11.36	0.08	12.88	0.71	10.82	0.24	0.23 Hexane

Controlled Potential to Emit (tons/year)									
Process/emission unit	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Grain Handling, Storage and Drying Processes	15.52	5.13	0.88	-	-	-	-	-	-
Column Dryer, combustion	0.24	0.98	0.98	0.08	12.88	0.71	10.82	0.24	0.23 Hexane
Fugitive Emissions - Paved Roads	11.34	2.27	0.56	-	-	-	-	-	-
Totals	27.10	8.38	2.41	0.08	12.88	0.71	10.82	0.24	0.23 Hexane

**TSD Appendix A: Emission Calculations
Particulate Emissions From Grain Handling, Storage and Drying Processes**

**Company Name: Cargill, Inc.
Source Address: 2000 W. Ohio Street, Evansville, IN 47712
Permit Number: M163-37380-00039
Reviewer: Bryce Hill**

Potential Grain Throughput Calculation

This source has defined the annual maximum throughput as 11,900,000 bushels (357,000 tons) per year. IDEM multiplied the requested throughput by an adjustment factor 1.2 to constitute a realistic upper bound on the amount of grain this country elevator could receive (428,400 tons per year). This methodology is based on an EPA Memo (dated 11/4/1995) entitled "Calculating Potential to Emit (PTE) and Other Guidance for Grain Handling Facilities"

Potential Grain Throughput		
(bushels/yr)	(lbs/bushel)	(tons/yr)
14,280,000	60	428,400

Total number of internal handling steps =

3

 Potential Internal Handling Throughput =

1,285,200

 tons/year

PTE Calculations

Emissions Unit Description	Maximum Grain Throughput (tons/yr)	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	PM2.5 Emission Factor (lbs/ton)	Control Device(s)	Collection and Control Efficiency (%)	PTE of PM Before Control (tons/yr)	PTE of PM10 Before Control (tons/yr)	PTE of PM2.5 Before Control (tons/yr)	PTE of PM After Control (tons/yr)	PTE of PM10 After Control (tons/yr)	PTE of PM2.5 After Control (tons/yr)
Receiving - Straight Truck *	428,400	0.18	0.059	0.010	Baghouse	99%	38.56	12.64	2.14	0.39	0.13	0.02
Receiving - Hopper Truck	428,400	0.035	0.0078	0.001	Baghouse	99%	7.50	1.67	0.28	0.07	0.02	0.00
Shipping - Truck *	428,400	0.086	0.029	0.0049	Baghouse	99%	18.42	6.21	1.05	0.18	0.06	0.01
Shipping - Railcar	428,400	0.027	0.0022	0.00037	Baghouse	99%	5.78	0.47	0.08	0.06	0.00	0.00
Shipping - Barge	428,400	0.016	0.004	0.00055	Baghouse	99%	3.43	0.86	0.12	0.03	0.01	0.00
Internal Handling	1,285,200	0.061	0.034	0.0058	Enclosed	90%	39.20	21.85	3.73	3.92	2.18	0.37
Storage - Silos and Bins	428,400	0.025	0.0063	0.0011	Oil/dust suppressant	70%	5.36	1.35	0.24	1.61	0.40	0.07
Drying - Column Dryer**	428,400	0.22	0.055	0.0094	Perforation Plate	80%	47.12	11.78	2.01	9.42	2.36	0.40
Total Worst Case Potential to Emit (PTE)							148.65	53.83	9.17	15.52	5.13	0.88

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

*For the potential to emit, IDEM has assumed the worst case scenario, where all grain is received by straight truck and all grain is shipped by truck.

**For the potential to emit, IDEM has assumed all received grain is dried.

Methodology

Maximum Grain Throughput (tons/yr) = Adjustment Factor (1.2) x annual maximum throughput (11,900,000 bushels/year) * 60 lbs/bushel * 1 ton/2,000 lbs

Maximum Grain Throughput for Internal Handling (tons/yr) = Maximum Grain Throughput (tons/yr) * Total number of internal handling steps

PTE of PM/PM10/PM2.5 Before Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs

PTE of PM/PM10/PM2.5 After Control (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2,000 lbs x (1- Control Efficiency (%))

**Appendix A: Emissions Calculations
Column Dryer Natural Gas Combustion
MM BTU/HR <100**

Company Name: Cargill, Inc.
Source Address: 2000 W. Ohio Street, Evansville, IN 47712
Permit Number: M163-37380-00039
Reviewer: Bryce Hill

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
30.0	1020	257.6

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
Potential Emission in tons/yr	0.24	0.98	0.98	0.08	**see below	0.71	10.82

*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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.7E-04	1.5E-04	9.7E-03	0.23	4.4E-04	0.24

	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	6.4E-05	1.4E-04	1.8E-04	4.9E-05	2.7E-04	7.1E-04
					Total HAPs	0.24
					Worst HAP	0.23

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.

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

**Company Name: Cargill, Inc.
Source Address: 2000 W. Ohio Street, Evansville, IN 47712
Permit Number: M163-37380-00039
Reviewer: Bryce Hill**

Total Maximum Grain Annual Throughput = tons/year

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Process	Vehicle Type	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)*	Maximum one-way distance (miles/trip)	Maximum one-way miles (miles/yr)
Grain truck entering site full	Grain Tanker (5 axle bulk dry tanker)	19.0	26.0	45.0	1.6E+04	7.4E+05	2640	0.50	8238.5
Grain truck leaving site empty	Grain Tanker (5 axle bulk dry tanker)	19.0	0.0	19.0	1.6E+04	3.1E+05	2640	0.50	8238.5
Onsite utility/maintenance pickup truck (10 one-way trips per day)	Pickup Truck	2.5	0.7	3.2	3.7E+03	1.2E+04	2640	0.50	1825.0
Total					36,604	1,066,203			18,302

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

Unmitigated Emission Factor, Ef = [k * (sL)^{0.91} * (W)^{1.02}] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	29.1	29.1	29.1	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)]

Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	2.71	0.54	0.13	lb/mile
Mitigated Emission Factor, Eext =	2.48	0.50	0.12	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Vehicle Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Grain truck entering site full	Grain Tanker (5 axle)	11.16	2.23	0.55	10.21	2.04	0.50	5.10	1.02	0.25
Grain truck leaving site empty	Grain Tanker (5 axle)	11.16	2.23	0.55	10.21	2.04	0.50	5.10	1.02	0.25
Onsite utility/maintenance pickup truck (10 one-way trips per day)	Pickup Truck	2.47	0.49	0.12	2.26	0.45	0.11	1.13	0.23	0.06
Total		24.80	4.96	1.22	22.68	4.54	1.11	11.34	2.27	0.56

Methodology

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

Abbreviations

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



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 9, 2016

Mr. Brett Ridge
Plant Manager
Cargill, Inc.
2000 West Ohio Street
Evansville, Indiana 47712

Re: Public Notice
Cargill, Inc.
Permit Level: MSOP - Renewal
Permit Number: 163-37380-00039

Dear Mr. Ridge:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Evansville Courier in Evansville, Indiana publish the abbreviated version of the public notice no later than August 12, 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 Willard Library, 21 First Avenue in Evansville, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Bryce Hill, 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 4-5952 or dial (317) 234-5952.

Sincerely,

Vicki Biddle

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 9, 2016

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

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Cargill, Inc., Vanderburgh County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 12, 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: MSOP - Renewal
Permit Number: 163-37380-00039

Enclosure

PN Newspaper.dot 2/17/2016



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 9, 2016

To: Willard Library of Evansville

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: Cargill, Inc.
Permit Number: 163-37380-00039

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 9, 2016
Cargill, Inc.
163-37380-00039

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 8/9/2016 Cargill, Inc. 163-37380-00039 DRAFT		Type of Mail: CERTIFICATE OF MAILING ONLY	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		

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		Brett Ridge Cargill, Inc. 2000 W Ohio St Evansville IN 47712 (Source CAATS)										
2		Evansville City Council and Mayors Office 1NW MLK Blvd, Rm 302 Evansville IN 47708 (Local Official)										
3		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 (Local Official)										
4		Willard Library of Evansville 21 First Ave Evansville IN 47710-1294 (Library)										
5		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)										
6		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 (Health Department)										
7		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)										
8		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)										
9		John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
10		Tom Nehrkom Amec Foster Wheeler Environmental & Infrastructre 4232 North Brandywine Drive, Suite A Peoria IL 61614 (Consultant)										
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender 10	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
--	--	--	--