

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) and ENHANCED NEW SOURCE REVIEW

OFFICE OF AIR MANAGEMENT and INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION

**Central Soya Company, Incorporated
1102 West 18th Street
Indianapolis, Indiana 46202**

Central Soya Company, 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 in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-5485-00008

Issued by:

Dr. Robert F. Holm, Administrator
Environmental Resources Management Division

Issuance Date:

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a grain terminal elevator stationary source.

Responsible Official: **Ron Raifsnider**
Source Address: **1102 West 18th Street, Indianapolis, Indiana 46202**
Mailing Address: **1102 West 18th Street, Indianapolis, Indiana 46202**
SIC Code: **5153**
County Location: **Marion**
County Status: **Nonattainment for PM**
Source Status: **Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD and Emission Offset Rules**

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

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

- (1) Truck Pit Receiving Area No. 1 designated as Emission Unit ID R1. Maximum rated capacity to receive grain is 324 tons of grain per hour. R1 receives grain from truck shipments that are hopper bottom or slide gate trucks. Emission Unit R1 is one (1) shed receiving area that can be enclosed by movable doors which allow truck shipments to enter and exit the shed. Emission Unit ID R1 is equipped with one (1) baghouse identified as CE R1 and exhausting at 32,000 acfm from Stack/Vent ID R1. PM emissions from the East Loader Equipment and Tunnel Belts are also vented to CE R1 baghouse. Once received, food grade soybean oil is sprayed on elevator basement conveyor belt grain at the rate of one (1) gallon applied per 1000 bushels of grain received. All receiving operations combined (R1 & R2) are limited to 15 million bushels received per rolling twelve (12) consecutive month period. Installation date of 1949.
- (2) Truck and Rail Pit Receiving Area No. 2 designated as Emission Unit ID R2. Maximum rated capacity to receive grain is 400 tons of grain per hour. R2 receives grain from truck shipments that are hopper bottom or slide gate trucks and from hopper bottom railcar shipments. R2 is one (1) shed receiving area that can be enclosed by movable doors which allow truck or railcar shipments to enter and exit the shed. Emission Unit ID R2 is equipped with one (1) baghouse identified as CE R2 and exhausting at 22,000 acfm from Stack/Vent ID R2. PM emissions from the Elevator Basement Conveyor and Bucket Elevator are also vented to the R2 baghouse. Once received, food grade soybean oil is sprayed on elevator basement conveyor belt grain at the rate of one (1) gallon applied per 1000 bushels of grain received. All receiving operations combined (R1 & R2) are limited to 15 million bushels received per rolling twelve (12) month period. Installation date of 1964.

- (3) One (1) Berico Column Grain Dryer with plate perforation diameter of less than 0.094 inches designated as Emission Unit ID GD. Maximum rated capacity is 45 tons of grain dried per hour. Equipped with natural gas fired fuel combustion equipment for drying. Maximum rated fuel combustion capacity of 14.5 million Btu per hour. A maximum of 50,000 acfm is exhausted from the grain dryer vent stack, Stack/Vent ID GD. Grain drying is limited to a maximum throughput of 2 million bushels of grain per rolling twelve (12) consecutive month period. Installation date of 1949.
- (4) Grain Dryer Conveyance System designated as Emission Unit ID GDCS. Maximum rated capacity is 45 tons of grain per hour. Emission Unit ID GDCS utilizes one (1) baghouse identified as CE GDCS and exhausting at 4500 acfm from Stack/Vent ID GDCS. The addition of food grade soybean oil to received grain on the elevator basement conveyor belt is estimated to provide additional emissions control prior to add on control. Grain drying is limited to a maximum throughput of 2 million bushels of grain per rolling twelve (12) consecutive month period. Installation date of 1959.
- (5) Tripper Equipment in Elevator Belt Conveying System designated Emission Unit ID TE. Maximum rated capacity is 450 tons of grain per hour. Emission Unit ID TE utilizes two (2) baghouses identified CE TE-W, the West Tripper Baghouse and CE TE-E, the East Tripper Baghouse. Each baghouse has an exhaust rate of 2000 acfm. CE TE-W is for Tripper Equipment emission control for the West Gallery Belt and exhausts at Stack/Vent ID TE-W and CE TE-E is for Tripper Equipment emission control for the East Gallery Belt and exhausts at Stack/Vent ID TE-E. The addition of food grade soybean oil to received grain on the elevator basement conveyor belt is estimated to provide additional emissions control prior to add on control. All receiving operations are limited to 15 million bushels received per rolling twelve (12) consecutive month period. Installation date of 1949.
- (6) Loader Equipment in Elevator Belt Conveying System designated Emission Unit ID LE. Maximum rated capacity is 450 tons of grain per hour. Emission Unit ID LE utilizes one (1) baghouse identified as CE LE, the West Loader Baghouse. CE LE is for West Loader emission control on the West Gallery Belt exhausting at 1500 acfm from Stack/Vent ID LE (The East Loader on the East Gallery Belt is vented to Emission Unit ID R1). The addition of food grade soybean oil to received grain on the elevator basement conveyor belt is estimated to provide additional emissions control prior to add on control. All receiving operations are limited to 15 million bushels received per rolling twelve (12) consecutive month period. Installation date of 1949.
- (7) Elevator Grain Loadout designated as Emission Unit ID EGLO. Maximum rated capacity is 150 tons of grain shipped per hour. Emission Unit ID EGLO is one (1) grain shipping shed in which rail cars or trucks are top loaded with grain for shipping. The addition of food grade soybean oil to received grain on the elevator basement conveyor belt is estimated to provide additional emissions control prior to loadout in the Emission Unit ID EGLO shipping shed. All shipping operations are limited to 15 million bushels shipped per rolling twelve (12) consecutive month period. Installation date of 1964.

- (8) One (1) Bean Bowl which is a grain storage bin consisting of Emission Unit ID BBC, BBL and BBSR. A maximum of 3.7 million bushels of grain may be stored in the Bean Bowl at any one time. Bean Bowl operations consist of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and Bean Bowl Storage and Removal (BBSR). The addition of food grade soybean oil to received grain on the elevator basement conveyor belt is estimated to provide emissions control. All Bean Bowl conveying, storage and removal are limited to 5 million bushels through per rolling twelve (12) consecutive month period. Installation date of 1964.

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

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

- (1) Natural gas-fired combustion sources with heat input equal or less than ten (10) million Btu per hour,
- (2) Cleaners and solvents, the use of which does not exceed 145 gallons per 12 months,
- (3) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment,
- (4) Paved and unpaved roads and parking lots with public access,
- (5) Underground conveyors,
- (6) Asbestos abatement projects regulated by 326 IAC 14-10,
- (7) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process,
- (8) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment,
- (9) Blowdown for any of the following: sight glass, boiler, compressor, pumps or cooling towers,
- (10) Bin aspiration of 0.005 gr/dscf having emissions less than permitting thresholds.

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

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

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and ERMD shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

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

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

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

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and ERMD.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by ERMD.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

B.6 Severability [326 IAC 2-8-4(4)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and ERMD along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(I)] [326 IAC 2-8-5(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, 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;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

IDEM, OAM

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

ERMD

Telephone No.: 317-327-2234

Facsimile No.: 317-327-2274

Failure to notify IDEM, OAM and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM and ERMD, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM and ERMD, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B.14 - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM and ERMD determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAM and ERMD, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM and ERMD, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and ERMD, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and ERMD and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM and ERMD upon receiving a timely and complete 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.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM and ERMD 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 in writing by IDEM, OAM and ERMD, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(I) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.21 Operational Flexibility [326 IAC 2-8-15]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;

- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

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

B.22 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM and ERMD, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and ERMD or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and ERMD nor an authorized representative, may disclose the information unless and until IDEM, OAM, and ERMD makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM, and ERMD acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM and ERMD shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and ERMD, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.26 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

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

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

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment is /are in operation.

C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Enforcement Section, Asbestos Program
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM and ERMD, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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 no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and ERMD that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Response Steps [326 IAC 2-8-4][326 IAC 2-8-5][326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

- (a) When the results of a stack test performed in conformance with Section C.8 - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient.

The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C.8- Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

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

- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM and ERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or ERMD makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or ERMD within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyzes were performed;
 - (3) The company or entity performing the analyzes;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyzes; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C.14 - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B.15-Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

<p>Emission Unit ID R1 Truck Pit Receiving Area No. 1, East Loader Equipment & Tunnel Belts</p>	<p>Facility Description [326 IAC 2-8-4(10)]Truck Pit Receiving Area No. 1 designated as Emission Unit ID R1. Maximum rated capacity to receive grain is 324 tons of grain per hour. R1 receives grain from truck shipments that are hopper bottom or slide gate trucks. R1 is one (1) shed receiving area that can be enclosed by movable doors which allow truck shipments to enter and exit the shed. Emission Unit ID R1 is equipped with one (1) baghouse identified as CE R1 and exhausting at 32,000 acfm from Stack/Vent ID R1. PM emissions from the East Loader Equipment and Tunnel Belts are also vented to CE R1 baghouse. Once received, food grade soybean oil is sprayed on elevator basement conveyor belt grain at the rate of one (1) gallon applied per 1000 bushels of grain received. All receiving operations combined (R1 & R2) are limited to 15 million bushels received per rolling twelve (12) consecutive month period. Installation date of 1949.</p>
<p>Emission Unit ID R2 Truck & Rail Pit Receiving Area No. 2</p>	<p>Facility Description [326 IAC 2-8-4(10)]Truck and Rail Pit Receiving Area No. 2 designated as Emission Unit ID R2. Maximum rated capacity to receive grain is 400 tons of grain per hour. R2 receives grain from truck shipments that are hopper bottom or slide gate trucks and from hopper bottom railcar shipments. R2 is one (1) shed receiving area that can be enclosed by movable doors which allow truck or railcar shipments to enter and exit the shed. Emission Unit ID R2 is equipped with one (1) baghouse identified as CE R2 and exhausting at 22,000 acfm from Stack/Vent ID R2. PM emissions from the Elevator Basement Conveyor and Bucket Elevator are also vented to the R2 baghouse. Once received, food grade soybean oil is sprayed on elevator basement conveyor belt grain at the rate of one (1) gallon applied per 1000 bushels of grain received. All receiving operations combined (R1 & R2) are limited to 15 million bushels received per rolling twelve (12) month period. Installation date of 1964.</p>

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

D.1.1 Particulate Matter (PM) [326 IAC 6-1-12]

Pursuant to 326 IAC 6-1-12 (Nonattainment Area Particulate Limitations: Marion County),

- (a) PM emissions from Emission Unit ID R1 Stack/Vent ID R1 and PM emissions from Emission Unit ID R2 Stack/Vent ID R2 each shall not exceed 0.006 gr/dscf, and
- (b) PM emissions from Emission Unit ID R1 Stack/Vent ID R1 shall not exceed 7.23 tons per rolling twelve (12) consecutive month period. PM emissions from Emission Unit ID R2 shall not exceed 4.95 tons per rolling twelve (12) consecutive month period.

D.1.2 Particulate Matter Less than Ten (10) Microns (PM10) [326 IAC 2-8-4(1)]

Pursuant to 326 IAC 2-8 Federally Enforceable State Operating Permit Program,

- (a) PM10 emissions from Emission Unit ID R1 are restricted to 7.23 tons per rolling twelve (12) consecutive month period.
- (b) PM10 emissions from Emission Unit ID R2 are restricted to 4.95 tons per rolling twelve (12) consecutive month period.
- (c) The combined total amount of grain received by Emission Unit ID R1 and Emission Unit ID R2 shall not exceed fifteen (15) million bushels received per rolling twelve (12) consecutive month period.

This throughput limitation with shed receiving and baghouse emission control is equivalent to less than 7.23 and 4.95 tons of PM10 emissions per rolling twelve (12) consecutive month period. Compliance with the PM10 limitations of Section D.1.2, D.2.2, D.3.2, D.4.2, D.5.2 and all Insignificant Activities limit source wide PM10 emissions to less than the major source threshold. Therefore, the requirements of 326 IAC 2-7 Part 70 Permit Program do not apply.

D.1.3 Application of Oil

All received grain shall be sprayed with a food grade oil dust suppressant at the rate of no less than one (1) gallon applied per 1000 bushels of grain received. The food grade oil dust suppressant shall be spray applied on all received grain as it is conveyed on the Elevator Basement Tunnel Belt.

D.1.4 Visible Emissions [326 IAC 6-1-2(d)(2)(C)]

Visible emissions from Emission Unit ID R1 and Emission Unit ID R2 shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1 (Opacity Regulations).

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for this Emission Unit ID R1 and R2 and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test Emission Unit ID R1 and/or R2 by this permit. However, IDEM and/or ERMD may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.1.1(a) shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing.

D.1.7 Particulate Matter [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2), Particulate Matter (PM) emissions shall be considered in compliance provided that:

- a) Good housekeeping and equipment maintenance procedures, pursuant to 326 IAC 6-1-2(d)(2), are implemented,
- b) Emissions are minimized in receiving, handling and shipping operations by appropriate methods. These may include but need not be limited to dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,
- c) No visible accumulation of particulate matter beyond the plant property line, and

- d) Emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions) and IAPCB Regulation II-4 (Air Borne Particulate).

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

D.1.8 Particulate Matter (PM)

The control equipment for PM for Emission Unit ID R1 and/or R2, identified as CE R1 and/or CE R2, shall be in operation at all times when Emission Unit R1 and/or Emission Unit R2 are in operation.

D.1.9 Daily Visible Emission Notations

- (a) Daily visible emission notations of the Stack/Vent ID R1 and Stack/Vent ID R2 stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.10 Parametric Monitoring - Pressure Readings

The Permittee shall take pressure readings from CE R1 and CE R2 baghouses controlling grain receiving emissions, at least once per week when grain receiving is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop for each compartment and for the Emission Units shall be maintained within the range of 1.0 and 10.0 inches of water. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for more than one reading. Corrective actions shall also be prescribed in the Compliance Response Plan for instances when a reading differs from the previous reading by one (1) or more inches of water.

The instrument used for determining the pressure shall comply with Section C.12 - Pressure Gauge Specifications, be subject to approval by ERMD and/or IDEM, OAM, and the frequency of calibration shall be listed and performed according to the Preventive Maintenance Plan.

D.1.11 Broken or Failed Bag Detection

In the event that bag failure has been observed,

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business

hours of discovery of the failure and shall include a timetable for completion. 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.14 - Emergency Provisions).

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B.14 - Emergency Provisions).

D.1.12 Oil Spray Application

A visual check shall be performed once per shift during periods that grain is being received to ensure that food grade oil is being spray applied to all received grain. The application rate shall be maintained at no less than one (1) gallon of food grade oil spray applied per 1000 bushels of grain received. If examination of the nozzles indicates clogging or spraying at a lower than specified application rate, corrective action will be implemented per the Compliance Response Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition D.1.9, the Permittee shall maintain records of daily visible emission notations of Emission Unit ID R1 and R2 stack exhaust(s).
- (b) To document compliance with Condition D.1.10 and D.1.11, the Permittee shall maintain the following:
 - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
 - Inlet and outlet differential static pressure;
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.12, the Permittee shall maintain the following:

Daily records of visual checks performed once per shift during periods that grain is being received to ensure that food grade oil is being spray applied to all received grain at the application rate of no less than one (1) gallon of food grade oil spray applied per 1000 bushels of grain received.

- (d) To document compliance with Condition D.1.1, D.1.2 and D.1.3, the Permittee shall maintain the following:
- (1) A monthly record of the combined total amount of grain received, in bushels, by Emission Unit ID R1 and Emission Unit ID R2 per rolling twelve (12) consecutive month period.
 - (2) A monthly record of the amount of food grade oil, in gallons, that is spray applied to all received grain.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1, D.1.2 and D.1.3 shall be submitted to the address(es) listed in Section C.18 - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

<p>Emission Unit ID TE Tripper Equipment (East & West)</p>	<p>Facility Description [326 IAC 2-8-4(10)] Tripper Equipment in Elevator Belt Conveying System designated Emission Unit ID TE. Maximum rated capacity is 450 tons of grain per hour. Emission Unit ID TE utilizes two (2) baghouses identified CE TE-W, the West Tripper Baghouse and CE TE-E, the East Tripper Baghouse. Each baghouse has an exhaust rate of 2000 acfm. CE TE-W is for Tripper Equipment emission control for the West Gallery Belt and exhausts at Stack/Vent ID TE-W and CE TE-E is for Tripper Equipment emission control for the East Gallery Belt and exhausts at Stack/Vent ID TE-E. The addition of food grade soybean oil to received grain on the elevator basement conveyor belt is estimated to provide additional emissions control prior to add on control. All receiving operations are limited to 15 million bushels received per rolling twelve (12) consecutive month period. Installation date of 1949.</p>
<p>Emission Unit ID LE Loader Equipment</p>	<p>Facility Description [326 IAC 2-8-4(10)] Loader Equipment in Elevator Belt Conveying System designated Emission Unit ID LE. Maximum rated capacity is 450 tons of grain per hour. Emission Unit ID LE utilizes one (1) baghouse identified as CE LE, the West Loader Baghouse. CE LE is for West Loader emission control on the West Gallery Belt exhausting at 1500 acfm from Stack/Vent ID LE (The East Loader on the East Gallery Belt is vented to Emission Unit ID R1). The addition of food grade soybean oil to received grain on the elevator basement conveyor belt is estimated to provide additional emissions control prior to add on control. All receiving operations are limited to 15 million bushels received per rolling twelve (12) consecutive month period. Installation date of 1949.</p>

**Emission Unit ID GDCS
Grain Dryer Conveyance
System**

Facility Description [326 IAC 2-8-4(10)] Grain Dryer Conveyance System designated as Emission Unit ID GDCS. Maximum rated capacity is 45 tons of grain per hour. Emission Unit ID GDCS utilizes one (1) baghouse identified as CE GDCS and exhausting at 4500 acfm from Stack/Vent ID GDCS. The addition of food grade soybean oil to received grain on the elevator basement conveyor belt is estimated to provide additional emissions control prior to add on control. Grain drying is limited to a maximum throughput of 2 million bushels of grain per rolling twelve (12) consecutive month period. Installation date of 1959.

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

D.2.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-12 (Nonattainment Area Particulate Limitations: Marion County),

- (a) PM emissions from Emission Unit ID TE, Emission Unit ID LE and Emission Unit ID GDCS each shall not exceed 0.006 gr/dscf, and
- (b) PM emissions from Emission Unit ID TE shall not exceed 0.92 tons per rolling twelve (12) consecutive month period,
- (c) PM emissions from Emission Unit ID LE shall not exceed 0.70 tons per rolling twelve (12) consecutive month period,
- (d) PM emissions from Emission Unit ID GDCS shall not exceed 1.01 tons per rolling twelve consecutive month period,

D.2.2 Particulate Matter Less than Ten (10) Microns (PM10)

Pursuant to 326 IAC 2-8 Federally Enforceable State Operating Permit Program,

- (a) PM10 emissions from Emission Unit ID TE shall not exceed 0.92 tons per rolling twelve (12) consecutive month period,
- (b) PM10 emissions from Emission Unit ID LE shall not exceed 0.70 tons per rolling twelve (12) consecutive month period,
- (c) PM10 emissions from Emission Unit ID GDCS shall not exceed 1.01 tons per rolling twelve consecutive month.

For the combined total amount of grain received by Emission Unit ID R1 and R2 not to exceed fifteen (15) million bushels per rolling twelve (12) consecutive month period, the spray application of food grade oil dust suppressant to all grain received and baghouse emission control for Emission Unit ID TE, LE and GDCS, PM10 emissions are equivalent to less than, respectively, 0.92 tons, 0.70 tons and 1.01 tons of emissions per rolling twelve (12) consecutive month period. Compliance with the PM10 limitations of Section D.1.2, D.2.2, D.3.2, D.4.2, D.5.2 and all Insignificant Activities limit source wide PM10 emissions to less than the major source threshold. Therefore, the requirements of 326 IAC 2-7 Part 70 Permit Program do not apply.

D.2.3 Visible Emissions [326 IAC 6-1-2(d)(2)(C)]

Visible emissions from Emission Unit ID TE, LE and GDCS shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1 (Opacity Regulations).

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID TE, LE and GDCS.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test Emission Unit ID TE, LE and/or GDCS by this permit. However, IDEM and/or ERMD may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.2.1(a) shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing.

D.2.6 Particulate Matter [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2), Particulate Matter (PM) emissions shall be considered in compliance provided that:

- a) Good housekeeping and equipment maintenance procedures, pursuant to 326 IAC 6-1-2(d)(2), are implemented,
- b) Emissions are minimized in receiving, handling and shipping operations by appropriate methods. These may include but need not be limited to dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,
- c) No visible accumulation of particulate matter beyond the plant property line, and
- d) Emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions) and IAPCB Regulation II-4 (Air Borne Particulate).

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

D.2.7 Particulate Matter (PM)

The baghouse(s) for PM control, identified as CE LE, CE TE and/or CE GDCS shall be in operation at all times when Emission Unit ID LE, TE and/or GDCS are in operation and exhausting to the outside atmosphere.

D.2.8 Visible Emissions Notations

- (a) Daily visible emission notations of the Emission Unit ID TE, LE and GDCS stack exhaust(s) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.9 Parametric Monitoring - Pressure Readings

The Permittee shall take pressure readings from the Emission Unit ID TE, LE and GDCS baghouses controlling grain handling, at least once per week when grain handling is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop for each compartment and for the Emission Units shall be maintained within the range of 1.0 and 10.0 inches of water. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for more than one reading. Corrective actions shall also be prescribed in the Compliance Response Plan for instances when a reading differs from the previous reading by one (1) or more inches of water.

The instrument used for determining the pressure shall comply with Section C.12 - Pressure Gauge Specifications, be subject to approval by ERMD and/or IDEM, OAM, and the frequency of calibration shall be listed and performed according to the Preventive Maintenance Plan.

D.2.10 Broken or Failed Bag Detection

In the event that bag failure has been observed,

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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.14 - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B.14 - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.11 Record Keeping Requirements

- (a) To document compliance with Condition D.2.8, the Permittee shall maintain records of daily visible emission notations of Emission Unit ID TE, LE and GDCS stack exhaust(s).

- (b) To document compliance with Condition D.2.9 and D.2.10, the Permittee shall maintain the following:
- (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

Inlet and outlet differential static pressure;
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.

SECTION D.3

FACILITY OPERATION CONDITIONS

Emission Unit ID GD Grain Dryer	Facility Description [326 IAC 2-8-4(10)] One (1) Berico Column Grain Dryer with plate perforation diameter of less than 0.094 inches designated as Emission Unit ID GD. Maximum rated capacity is 45 tons of grain dried per hour. Equipped with natural gas fired fuel combustion equipment for drying. Maximum rated fuel combustion capacity of 14.5 million Btu per hour. A maximum of 50,000 acfm is exhausted from the grain dryer vent stack, Stack/Vent ID GD. Grain drying is limited to a maximum throughput of 2 million bushels of grain per rolling twelve (12) consecutive month period. Installation date of 1949.
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Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations: Specified), PM emissions from Emission Unit ID GD shall not exceed 0.03 gr/dscf.

D.3.2 Particulate Matter Ten (10) Microns or Less (PM10)

Pursuant to 326 IAC 2-8 Federally Enforceable Permit Program, the amount of grain dried (in bushels) is restricted to two (2) million bushels per rolling twelve (12) consecutive month period.

This throughput limitation is equivalent to less than 1.6 tons of PM10 emissions per rolling twelve (12) consecutive month period. Compliance with the PM10 limitations of Section D.1.2, D.2.2, D.3.2, D.4.2, D.5.2 and all Insignificant Activities limit source wide PM10 emissions to less than the major source threshold. Therefore, the requirements of 326 IAC 2-7 Part 70 Permit Program do not apply.

D.3.3 Visible Emissions [326 IAC 6-1-2(d)(2)(C)]

Visible emissions from Emission Unit ID GD shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1 (Opacity Regulations).

D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID GD.

Compliance Determination Requirements

D.3.5 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test Emission Unit ID GD by this permit. However, IDEM and/or ERMD may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing.

D.3.6 Particulate Matter [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2), Particulate Matter (PM) emissions shall be considered in compliance provided that:

- a) Good housekeeping and equipment maintenance procedures, pursuant to 326 IAC 6-1-2(d)(2), are implemented,
- b) Emissions are minimized in receiving, handling and shipping operations by appropriate methods. These may include but need not be limited to dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,
- c) No visible accumulation of particulate matter beyond the plant property line, and
- d) Emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions) and IAPCB Regulation II-4 (Air Borne Particulate).

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

D.3.7 Daily Visible Emission Notations

- (a) Daily visible emission notations of the Emission Unit ID GD stack exhaust(s) shall be performed during normal daylight operations when grain drying is in operation. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.7, the Permittee shall maintain records of daily visible emission notations of Emission Unit GD stack exhaust when grain drying is in operation.
- (b) A monthly record of the total amount of grain dried, in bushels, by Emission Unit ID GD per rolling twelve (12) consecutive month period.

D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the address(es) listed in Section C.18 - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4 FACILITY OPERATION CONDITIONS

Emission Unit ID EGLO Elevator Grain Loadout	Facility Description [326 IAC 2-8-4(10)] Elevator Grain Loadout designated as Emission Unit ID EGLO. Maximum rated capacity is 150 tons of grain shipped per hour. Emission Unit ID EGLO is one (1) grain shipping shed in which rail cars or trucks are top loaded with grain for shipping. The addition of food grade soybean oil to received grain on the elevator basement conveyor belt is estimated to provide additional emissions control prior to loadout in the Emission Unit ID EGLO shipping shed. All shipping operations are limited to 15 million bushels shipped per rolling twelve (12) consecutive month period. Installation date of 1964.
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Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations: Specified), PM emissions from Emission Unit ID EGLO shall not exceed 0.03 gr/dscf.

D.4.2 Particulate Matter Ten (10) Microns or Less (PM10)

Pursuant to 326 IAC 2-8 Federally Enforceable Permit Program, the amount of grain shipped (in bushels) is restricted to fifteen (15) million bushels per rolling twelve (12) consecutive month period.

This throughput limitation, with oil application and shed shipping, is equivalent to less than 0.34 tons of PM10 emissions per rolling twelve (12) consecutive month period. Compliance with the PM10 limitations of Section D.1.2, D.2.2, D.3.2, D.4.2, D.5.2 and all Insignificant Activities limit source wide PM10 emissions to less than the major source threshold. Therefore, the requirements of 326 IAC 2-7 Part 70 Permit Program do not apply.

D.4.3 Visible Emissions [326 IAC 6-1-2(d)(2)(C)]

Visible emissions from Emission Unit ID EGLO shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1 (Opacity Regulations).

D.4.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for this facility and its control.

Compliance Determination Requirements

D.4.5 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test Emission Unit ID EGLO by this permit. However, IDEM and/or ERMD may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing.

D.4.6 Particulate Matter [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2), Particulate Matter (PM) emissions shall be considered in compliance provided that:

- a) Good housekeeping and equipment maintenance procedures, pursuant to 326 IAC 6-1-2(d)(2), are implemented,
- b) Emissions are minimized in receiving, handling and shipping operations by appropriate methods. These may include but need not be limited to dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,
- c) No visible accumulation of particulate matter beyond the plant property line, and
- d) Emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions) and IAPCB Regulation II-4 (Air Borne Particulate).

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

D.4.7 Daily Visible Emission Notations

- (a) Daily visible emission notations of the Emission Unit ID EGLO shall be performed during normal daylight operations when grain shipping is in operation. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.7, the Permittee shall maintain records of daily visible emission notations of Emission Unit EGLO when grain shipping is in operation.
- (b) A monthly record of the total amount of grain shipped, in bushels, by Emission Unit ID EGLO per rolling twelve (12) consecutive month period.

D.4.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.2 shall be submitted to the address(es) listed in Section C.18 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.5 FACILITY OPERATION CONDITIONS

Emission Unit ID BBC, BBL & BBSR Bean Bowl Conveying Bean Bowl Leg Bean Bowl Storage & Retrieval	Facility Description [326 IAC 2-8-4(10)] One (1) Bean Bowl which is a grain storage bin consisting of Emission Unit ID BBC, BBL and BBSR. A maximum of 3.7 million bushels of grain may be stored in the Bean Bowl at any one time. Bean Bowl operations consist of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and Bean Bowl Storage and Removal (BBSR). The addition of food grade soybean oil to received grain on the elevator basement conveyor belt is estimated to provide emissions control. All Bean Bowl conveying, storage and removal are limited to 5 million bushels through per rolling twelve (12) consecutive month period. Installation date of 1964.
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Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations: Specified), PM emissions from Emission Unit ID BBC, BBL and BBSR shall not exceed 0.03 gr/dscf.

D.5.2 Particulate Matter Ten (10) Microns or Less (PM10)

Pursuant to 326 IAC 2-8 Federally Enforceable Permit Program, the amount of grain processed through Emission Unit ID BBC, BBL and BBSR (in bushels) is restricted to no more than five (5) million bushels per rolling twelve (12) consecutive month period.

This throughput limitation, with oil application to all received grain by Emission Unit ID R1 and R2, is equivalent to less than 2.4 tons of PM10 per year. Compliance with the PM10 limitations of Section D.1.2, D.2.2, D.3.2, D.4.2, D.5.2 and all Insignificant Activities limit source wide PM10 emissions to less than the major source threshold. Therefore, the requirements of 326 IAC 2-7 Part 70 Permit Program do not apply.

D.5.3 Visible Emissions [326 IAC 6-1-2(d)(2)(C)]

Visible emissions from Emission Unit ID BBC, BBL and BBSR shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1 (Opacity Regulations).

Compliance Determination Requirements

D.5.4 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test Emission Unit ID BBC, BBL and or BBSR by this permit. However, IDEM and/or ERMD may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing.

D.5.5 Particulate Matter [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2), Particulate Matter (PM) emissions shall be considered in compliance provided that:

- a) Good housekeeping and equipment maintenance procedures, pursuant to 326 IAC 6-1-2(d)(2), are implemented,
- b) Emissions are minimized in receiving, handling and shipping operations by appropriate methods. These may include but need not be limited to dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,
- c) No visible accumulation of particulate matter beyond the plant property line, and
- d) Emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions) and IAPCB Regulation II-4 (Air Borne Particulate).

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

D.5.6 Daily Visible Emission Notations

- (a) Daily visible emission notations of Emission Unit ID BBC, BBL and BBSR shall be performed during normal daylight operations when grain transferring is in operation. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

D.5.7 Record Keeping Requirements

- (a) To document compliance with Condition D.5.6, the Permittee shall maintain records of daily visible emission notations of Emission Unit BBC, BBL and BBSR when grain transferring is in operation.
- (b) A monthly record of the total amount of grain transferred, in bushels, by Emission Unit ID BBC, BBL and BBSR per rolling twelve (12) consecutive month period.

D.5.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.2 shall be submitted to the address(es) listed in Section C.18 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.6 FACILITY OPERATION CONDITIONS

Insignificant Activities

Process Activities - Bin Vents

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

D.6.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations: Specified), PM emissions from the bin vents shall not exceed 0.03 gr/dscf.

D.6.2 Visible Emissions [326 IAC 6-1-2(d)(2)(C)]

Visible emissions from Emission Unit ID Bin Vents shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1 (Opacity Regulations).

Compliance Determination Requirement

D.6.3 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test bin vents by this permit. However, IDEM and/or ERMD may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing.

D.6.4 Particulate Matter [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2), Particulate Matter (PM) emissions shall be considered in compliance provided that:

- a) Good housekeeping and equipment maintenance procedures, pursuant to 326 IAC 6-1-2(d)(2), are implemented,

- b) Emissions are minimized in receiving, handling and shipping operations by appropriate methods. These may include but need not be limited to dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,
- c) No visible accumulation of particulate matter beyond the plant property line, and
- d) Emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions) and IAPCB Regulation II-4 (Air Borne Particulate).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Central Soya Company, Incorporated
Source Address: 1102 West 18th Street, Indianapolis, Indiana 46244
Mailing Address: 1102 West 18th Street, Indianapolis, Indiana 46244
FESOP No.: F097-5485-00008

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

2700 S. Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

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

Source Name: Central Soya Company, Incorporated
Source Address: 1102 West 18th Street, Indianapolis, Indiana 46244
Mailing Address: 1102 West 18th Street, Indianapolis, Indiana 46244
Part 70 Permit No.: F097-5485-00008

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the ERMD and OAM, within four (4) business hours; and
CThe Permittee must submit notice in writing or by facsimile to ERMD and OAM within two (2) days, and follow the other requirements of 326 IAC 2-8-12

9 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C)
CThe Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY REPORT FORM**

Source Name: Central Soya Company, Incorporated
 Source Address: 1102 West 18th Street, Indianapolis, Indiana 46244
 FESOP No.: F097-5485-00008
 Facility: **Emission Unit ID's R1 and R2**
 Parameter: Monthly/Rolling monthly throughput Limit: R1 & R2: 15 million bushels per rolling 12 month period. Oil application: 1 gal/1000 bushels received.

Quarter _____ Year _____

Month	Throughput this month (bushels)	Throughput per rolling 12 consecutive month period (bushels)	oil usage (gallons)

9 No deviation occurred in this month 9 Attached are supporting spreadsheets.
 9 Deviation/s occurred in this month. Deviation has been reported on: _____

The filing of such information is mandated by Federal, State, and Local Air Pollution Legislation. Violation of this mandate through omission or false information may be subject to penalty.

I hereby certify that the information contained in this notification is complete and accurate to the best of my knowledge.

Submitted by: _____ Title/Position _____
 (Print)

Signature: _____ Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY REPORT FORM**

Source Name: Central Soya Company, Incorporated
Source Address: 1102 West 18th Street, Indianapolis, Indiana 46244
FESOP No.: F097-5485-00008
Facility: **Emission Unit ID GD**
Parameter: Rolling monthly throughput Limit: GD: 2 million bushels per rolling 12 month period

Quarter _____ Year _____

Month	Throughput this month (bushels)	Throughput per rolling 12 month period (bushels)

9 No deviation occurred in this month 9 Attached are supporting spreadsheets.
9 Deviation/s occurred in this month. Deviation has been reported on: _____

The filing of such information is mandated by Federal, State, and Local Air Pollution Legislation. Violation of this mandate through omission or false information may be subject to penalty.

I hereby certify that the information contained in this notification is complete and accurate to the best of my knowledge.

Submitted by: _____ Title/Position _____
 (Print)

Signature: _____ Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
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and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY REPORT FORM**

Source Name: Central Soya Company, Incorporated
Source Address: 1102 West 18th Street, Indianapolis, Indiana 46244
FESOP No.: F097-5485-00008
Facility: **Emission Unit ID EGLO's**
Parameter: Rolling monthly throughput
Limit: EGLO: 15 million bushels
per rolling 12 month period

Quarter _____ Year _____

Month	Throughput this month (bushels)	Throughput per rolling 12 month period (bushels)

- 9 No deviation occurred in this month
9 Deviation/s occurred in this month.
- 9 Attached are supporting spreadsheets.
9 Deviation has been reported on: _____

The filing of such information is mandated by Federal, State, and Local Air Pollution Legislation. Violation of this mandate through omission or false information may be subject to penalty.

I hereby certify that the information contained in this notification is complete and accurate to the best of my knowledge.

Submitted by _____ Title/Position _____
(Print)

Signature: _____ Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY REPORT FORM

Source Name: Central Soya Company, Incorporated
 Source Address: 1102 West 18th Street, Indianapolis, Indiana 46244
 FESOP No.: F097-5485-00008
 Facility: **Emission Unit ID BBC, BBL & BBSR**
 Parameter: Rolling monthly throughput Limit: Bean Bowl: 5 million bushels per rolling 12 month period

Quarter _____ Year _____

Month	Throughput this month (bushels)	Throughput per rolling 12 month period (bushels)

9 No deviation occurred in this month 9 Attached are supporting spreadsheets.
 9 Deviation/s occurred in this month. Deviation has been reported on: _____

The filing of such information is mandated by Federal, State, and Local Air Pollution Legislation. Violation of this mandate through omission or false information may be subject to penalty.

I hereby certify that the information contained in this notification is complete and accurate to the best of my knowledge.

Submitted by: _____
 Title/Position _____
 (Print)

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**
 and
**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Central Soya Company, Incorporated
 Source Address: 1102 West 18th Street, Indianapolis, Indiana 46244
 Mailing Address: 1102 West 18th Street, Indianapolis, Indiana 46244
 FESOP No.: F097-5485-00008

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations in this reporting period."

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

City of Indianapolis
Environmental Resources Management Division

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

Source Background And Description

Source Name: Central Soya Company, Incorporated
Source Location: 1102 West 18th Street, Indianapolis, IN 46244
County: Marion
Operation Permit No.: F097-5485-00008
SIC Code: 5153
Permit Reviewer: Mark Caraher

The City of Indianapolis Environmental Resources Management Division (ERMD) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Central Soya Company Incorporated relating to the operation of a grain terminal.

The source consists of the following approvals (permits, registrations, exemptions, etc.) with the following emission units and pollution control devices:

- (1) Truck Pit Receiving Area No. 1 designated as Emission Unit ID R1. R1 receives grain from truck shipments that are hopper bottom or slide gate trucks. R1 is one (1) shed receiving area that can be enclosed by movable doors which allow truck shipments to enter and exit the shed. An estimated efficiency of 90% is achieved by the use of the shed in controlling Particulate Matter (PM) emissions. R1 is equipped with one (1) baghouse rated at 99.9 % efficiency and exhausting 32,000 acfm from Stack/Vent ID R1. PM emissions from the East Loader Equipment and Tunnel Belts are also vented to the R1 baghouse. Once received, food grade soybean oil is sprayed on elevator basement conveyor belt grain received at the rate of one (1) gallon applied per 1000 bushels of grain received. The addition of oil to received grain is estimated to provide an 80 % reduction in emissions control prior to add on control. All receiving operations combined (R1 & R2) are restricted to 15 million bushels received per rolling twelve (12) month period. Installation date of 1949.
- (2) Truck and Rail Pit Receiving Area No. 2 designated as Emission Unit ID R2. R2 receives grain from truck shipments that are hopper bottom or slide gate trucks and from hopper bottom railcar shipments. R2 is one (1) shed receiving area that can be enclosed by movable doors which allow truck shipments to enter and exit the shed. An estimated efficiency of 90 % is achieved by the use of the shed in controlling Particulate Matter emissions. R2 is equipped with one (1) baghouse rated at 99.9 % efficiency and exhausting 22,000 acfm from Stack/Vent ID R2. PM emissions from the Elevator Basement Conveyor and Bucket Elevator are also vented to the R2 baghouse. Once received, food grade soybean oil is sprayed on elevator basement conveyor belt grain received at the rate of one (1) gallon applied per 1000 bushels of grain received. The addition of oil to received grain is estimated to provide an 80 % reduction in emissions prior to add on control. All receiving operations combined (R1 & R2) are restricted to 15 million bushels received per rolling twelve (12) month period. Installation date of 1964.

- (3) One (1) Berico Column Grain Dryer designated as Emission Unit ID GD. Plate perforation diameter of 0.083 inches. Equipped with natural gas fired fuel combustion equipment for drying. Maximum rated fuel combustion capacity of 14.5 million Btu per hour. Grain drying is restricted to a maximum throughput of 2 million bushels of grain per rolling twelve (12) month period. A maximum of 50,000 acfm is exhausted from the grain dryer vent stack, Stack/Vent ID GD. A 300 micron mesh screen is in place as emission control for Emission Unit ID GD. Installation date of 1949.
- (4) Grain Dryer Conveyance System designated as Emission Unit ID GDCS. Emission Unit ID GDCS utilizes one (1) baghouse identified as Stack/Vent ID GDCS, the Grain Dryer Conveyance System baghouse. The addition of oil to received grain is estimated to provide an 80 % reduction in emissions control prior to add on control. The Grain Dryer Conveyance System baghouse is rated at 99.9 % efficiency in PM emission control and has an exhaust rate of 4500 acfm. Grain drying is restricted to a maximum throughput of 2 million bushels of grain per rolling twelve (12) month period. Installation date of 1959.
- (5) Tripper Equipment in Elevator Belt Conveying System designated Emission Unit ID TE. Emission Unit ID TE utilizes two (2) baghouses identified as Stack/Vent ID TE-W, the West Tripper Baghouse, and Stack/Vent ID TE-E, the East Tripper Baghouse. Stack/Vent ID TE-W is for Tripper Equipment emission control for the West Gallery Belt and Stack/Vent ID TE-E is for Tripper Equipment emission control for the East Gallery Belt. The addition of oil to received grain is estimated to provide an 80 % reduction in emissions control prior to add on control. Each baghouse is rated at 99.9 % efficiency in PM emission control and each baghouse has an exhaust rate of 2000 acfm. All receiving operations are restricted to 15 million bushels received per rolling twelve (12) month period. Installation date of 1949.
- (6) Loader Equipment in Elevator Belt Conveying System designated Emission Unit ID LE. Emission Unit ID LE utilizes one (1) baghouse identified as Stack/Vent ID LE, the West Loader Baghouse. Stack/Vent ID LE is for West Loader emission control on the West Gallery Belt. The addition of oil to received grain is estimated to provide an 80 % reduction in emissions control prior to add on control. The West Loader baghouse is rated at 99.9 % efficiency in PM emission control and has an exhaust rate of 1500 acfm. (The East Loader on the East Gallery Belt is vented to Emission Unit ID R1). All receiving operations are restricted to 15 million bushels received per rolling twelve (12) month period. Installation date of 1949.
- (7) Elevator Grain Loadout designated as Emission Unit ID EGLO. Emission Unit ID EGL is one (1) grain shipping shed in which rail cars or trucks are top loaded with grain for shipping. The addition of oil to received grain is estimated to provide an 80 % reduction in emissions control prior to add on control. Emission Unit ID EGLO has been given an efficiency of 75 % in PM emissions control from loadout operations. All shipping operations are restricted to 15 million bushels shipped per rolling twelve (12) month period. Installation date of 1964.

The source also consists of the following unpermitted facilities/units:

- (1) One (1) Bean Bowl which is a grain storage bin consisting of Emission Unit ID BBC, BBL and BBSR. A maximum of 3.7 million bushels of grain may be stored in the Bean Bowl at any one time. Bean Bowl operations consist of Bean Bowl Conveyors(BBC) (2), one (1) Bean Bowl Leg (BBL) and Bean Bowl Storage and Removal (BBSR). The addition of oil to received grain is estimated to provide an 80 % reduction in emissions control prior to add on control. All Bean Bowl conveying, storage and removal are restricted to 5 million bushels through per rolling twelve (12) month period. Installation date of 1964.

The source also includes the following insignificant activities:

- (1) Natural gas-fired combustion sources with heat input equal or less than ten (10) million Btu per hour,
- (2) Cleaners and solvents, the use of which does not exceed 145 gallons per 12 months,
- (3) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment,
- (4) Paved and unpaved roads and parking lots with public access,
- (5) Underground conveyors,
- (6) Asbestos abatement projects regulated by 326 IAC 14-10,
- (7) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process,
- (8) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment,
- (9) Blowdown for any of the following: sight glass, boiler, compressor, pumps or cooling towers,
- (10) Bin aspiration of 0.005 gr/dscf having emissions less than permitting thresholds.

Enforcement Issue

ERMD is aware that the Bean Bowl had been placed back into service prior to January 1, 1994 and prior to receipt of the proper permit. ERMD is reviewing this matter and will take appropriate action. This proposed FESOP will also satisfy the requirements of the construction permit rules.

There are no Enforcement actions pending.

Recommendation

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

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

A complete FESOP application for the purposes of this review was received on December 13, 1996.

Potential to Emit (PTE) Calculations

See Appendix A Potential to Emit (PTE) Calculation for detailed calculations (Pages 1 through 4).

According to the FESOP application filed March 15, 1996, a total of 724 tons of grain can be received per hour. A maximum of 450 tons of grain per hour can be loaded in to silos. If no reasonable assumption on maximum capacity is made, then a maximum of 131 million bushels can be received and loaded in 8760 hours (450 tons/hr x 2000 lbs/ton x bushel/60 lbs x 8760 hrs/yr = 131 MM bushels/yr) and the resultant PM10 emission rate at maximum capacity is, approximately, 705 tons of PM10 per year (450 tons grain per hour x 0.3575 lbs PM10 per ton grain handled (refer to TSD Appendix A Page 1) x 8760 hours per year x 1 ton per 2000 lbs = 705 tons PM10 per year). At 450 tons of grain received per hour, approximately, 2858 tons of Particulate Matter (PM) per year would be the resultant emission rate at maximum capacity.

Central Soya Company, Incorporated has indicated, per the FESOP application of March 15, 1996, that the actual total amount of grain received for 1995 was 4.42 million bushels. Central Soya Company, Incorporated has indicated that 15 million bushels is the maximum amount of grain that could ever reasonably be received at that location. Central Soya is requesting that a FESOP be issued with a total maximum throughput limitation of 15 million bushels received per rolling twelve (12) consecutive month period and be issued with revised Particulate Matter (PM) limits for 326 IAC 6-1-12, per Central Soya Company, Incorporated SIP revision request of June 8, 1995. The Limited PTE Table found in this TSD shows that the revised PM SIP limits and the 15 million bushel throughput limitation yields PM and PM10 emissions of less than 90 tons per rolling twelve (12) consecutive month period. Approximately, 0.9 tons per year of PM/PM10 results from Grain Dryer fuel combustion (see TSD Appendix A Page 3 of 4).

Total PTE

PTE is defined as “the maximum capacity of a stationary source to emit a pollutant under its physical and operational design.”

Pollutant	PTE (tons/year)
PM	2859
PM-10	706
NOx	8.9
VOC	0.2
CO	2.2

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

The potential to emit PM10 as defined in the Indiana Rule are greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7-1.

A source with “potential to emit” high enough to make it a “major source” but whose actual emissions are below the Part 70 emission levels may elect to avoid the Part 70 Operating Permit Program by agreeing to accept a permit with federally enforceable limits that restrict its PTE to below the major source emission levels. The permit containing these restrictions is called a Federally Enforceable State Operating Permit (FESOP).

County Attainment Status

The source is located in **Marion County**.

Pollutant	Status (attainment or unclassifiable/ severe, moderate, marginal, or maintenance nonattainment)
TSP	nonattainment
PM-10	unclassifiable
SO ₂	attainment
OZONE	attainment
CO	attainment
NO ₂	attainment

Limited PTE

The source has accepted a federally enforceable PM10 limit of 20.1 tons per year.

Process/ facility	Limited PTE (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Emission Unit ID R1 Elevator No. 1 Truck Receiving System & Basement (SIP-10A)	7.23	7.23					
Emission Unit ID R2 Elevator No. 2 Truck & Rail Receiving System (SIP-10B)	4.95	4.95					
Emission Unit ID TE Tripper Equipment (SIP-9A)	0.92	0.92					
Emission Unit ID LE Loader Equipment (SIP-9B)	0.70	0.70					
Emission Unit ID GDCS Grain Dryer Conveyance System (SIP-9C)	1.01	1.01					

Emission Unit ID GD Grain Dryer	6.6	1.6					
Emission Unit ID GD Grain Dryer fuel combustion	0.9	0.9	0.0	0.2	2.2	8.9	
Emission Unit ID BBC, BBL & BBSR Bean Bowl (Conveying, Leg & Storage & Removal)	9.4	2.4					
Emission Unit ID EGLO Elevator Grain Loadout	1.2	0.4					
Insignificant Activities	0.0	0.0					
Total Emissions	32.9	20.1	0.0	0.2	2.2	8.9	

Federal Rule Applicability

No New Source Performance Standards (326 IAC 12) or National Emission Standards for Hazardous Pollutants (326 IAC 14) appear to be applicable to this facility.

Central Soya Company, Incorporated has a number of points identified in the State Implementation Plan (SIP) for Particulate Matter found under 40 CFR Part 52 Subpart P and 326 IAC 6-1-12. Many of the identified points in the SIP have either been taken out of service or their operation was discontinued. However, two (2) points continue to be in operation and are included in the Potential to Emit and Limited PTE Table(s). Conveyor System Aspiration (Point ID 9) and the Truck Pit Receiving Area (Point ID 10) remain in service. Central Soya has indicated that they cannot currently comply with the current PM SIP limits 0.42 and 1.1 tons of PM per year for Point ID 9 and 10, respectfully. A SIP Revision request letter of June 8, 1995, an Indiana Register Notice of August 1995 and a modeling study submitted to IDEM-OAM on March 27, 1997 have all been performed in order to revise the current PM SIP for these two point ID's. No new equipment or operations are being added. Current 326 IAC 6-1-12 Point 9 is being split into Point 9A, 9B and 9C. Point 10 is being split into Point 10A and 10B. The FESOP incorporates requested revisions which indicate an overall net reduction in current SIP allowable emissions for Particulate Matter (PM). The requested ton per year limitations for PM are identified in the Limited PTE Table. A summary of the current versus requested PM limits for current operations are found in the Table below.

SIP Point ID No.	Current PM Limitation		SIP Point ID No.	Requested PM Limitation	
	gr/dscf	tons/yr		gr/dscf	tons/yr
1 Vogt Boiler	0.35 #/MMBtu	32.3	Removed from Service	0	0
2 Toasting Millfeed	0.013	5.0	Removed from Service	0	0

3 Dry Soybean Meal	0.03	5.6	Removed from Service	0	0
4 Soybean Meal Cooler	0.03	10.2	Removed from Service	0	0
5 Pellet Cooler (South)	0.03	7.4	5 Pellet Cooler (South)	* 0.03	* 7.4
6 Feed Pellet Cooler (North)	0.034	9.0	6 Feed Pellet Cooler (North)	* 0.034	* 9.0
8 Bean Bowl Com.	0.001	0.02	8 Bean Bowl	** 0	** 0
9 Conveyor System Aspiration	0.001	0.42	9A Elevator Gallery Belt Trippers East & West	0.006	0.92
			9B Elevator Gallery Belt Loaders East & West	0.006	0.70
			9C Elevator Grain Dryer Conveying Legs	0.006	1.01
10 Truck Pit Receiving Area	0.006	1.1	10A Elevator No. 1 Truck Receiving System & Basement	0.006	7.23
			10B Elevator No. 2 Truck and Rail Receiving System	0.006	4.95

* = Central Soya does not wish to have listed under FESOP at this time - no longer present.

** = FESOP operation but removed from SIP as a listed point.

State Rule Applicability

326 IAC 1-6 Malfunctions & 1-6-3 Preventive Maintenance Plans

Because potential PM emissions exceed 25 tons/yr, a permit would then be required which would then require the source to report malfunctions and to draft & implement a preventive maintenance plan.

326 IAC 1-7 Stack Height Provisions

Because all Emission Unit ID's were constructed prior to 6/79, 326 IAC 1-7 does not appear to apply to mandate stacks be constructed using GEP stack height.

326 IAC 2-6 Emission Reporting

Limited potential PM, PM10, NOx and VOC emissions **do not** exceed thresholds (100 tons and/or 10 tons per year) requiring an Annual Emission Statement each year. Therefore, rule does not apply.

326 2-8 Federally Enforceable State Operating Permit Program

Source has Potential to Emit PM10 above major source threshold(s). However, actual emissions are less than major source threshold(s) and, therefore, qualifies to be as a FESOP source. The source has filed an application and, therefore, all requirements under 326 IAC 2-8 are applicable. Permit requirements to limit any specific source wide regulated pollutant potential to emit or allowable emission level to below major source threshold levels would also be enforceable as per 326 IAC 2-8.

Using the AP-42 Table 9.9.1-2 Interim Uncontrolled Particulate Emission Factors for Grain Elevators, a dustiness ratio of 2.5 for soybeans and corn and Central Soya requested throughput limitation of 15 million bushels through per year, 5 million bushels through the Bean Bowl per year and 2 million bushels of grain dried annually, potential PM and PM 10 emissions fall below the major source threshold of 100 tons per year. With the addition of soybean oil to all received grain at the rate of 1 gallon per 1000 bushels received and with the use of baghouses as PM emission control for several Emission Units, actual emissions fall well below the major source threshold. At the specifically requested throughput limitation(s), Central Soya Company, Incorporated has agreed to accept 20.1 tons of PM10 per rolling twelve (12) consecutive month period as an overall source wide allowable emission limit.

326 IAC 5-1-2 Opacity Regulations

The opacity limit of 30 % opacity stated in 326 IAC 5-1-2 appears to apply to this source.

326 IAC 6-1-12 Nonattainment Area Particulate Limitations: Marion County

This rule is applicable as Central Soya is specifically named in the Particulate Matter SIP for Indiana under 326 IAC 6-1-12.

Central Soya cannot comply with current PM SIP limitations found in 326 IAC 6-1-12. Central Soya initiated the SIP Revision process with IDEM-OAM by way of June 8, 1995 SIP Revision request letter, August 1995 Indiana Register Notice and a modeling demonstration submitted March 27, 1997 demonstrating attainment of the NAAQS. Refer to the Table under Federal Rule Applicability section of this TSD for a listing of the current versus proposed revisions.

326 IAC 6-3-2 Process Operations: Particulate Emission Limitations

The Bean Bowl, Emission Unit ID's BBC, BBL and BBSR and Elevator Grain Loadout, Emission Unit ID EGLO, do not have facility emissions PM exceeding 100 tons per year (see TSD Appendix A Page 2 of 4). No exhausting of process air occurs for these Emission Unit ID's except the grain dryer. Short term PM limits in pounds of PM per hour for Emission Unit ID's BBC, BBL, BBSR, GD and EGLO are set at 326 IAC 6-3-2 PM limit of 55.0 P^{0.11} - 40. The use of AP-42 emission factors for these units demonstrates compliance with the 326 IAC 6-3-2 process weight rate limit. FESOP PM/PM10 tons per year limits are set at the calculated emission rate for restricted throughput (5 million bushels per year for the Bean Bowl and 2 million bushels per year for the grain dryer) at the AP-42 emission factor emission rate.

326 IAC 6-4 Fugitive Dust Emissions

Regulation is applicable to PM sources capable of generating visible dust emissions that cross the property line(s). Source is required to minimize PM emissions such that they do not visibly cross property lines.

326 IAC 6-5 Fugitive Particulate Matter Emission Limitations

Because truck dump(s), Bean Bowl and Elevator Grain Loadout fugitive PM potential emissions exceed 25, regulation is applicable. Requires a fugitive dust control plan be implemented.

326 IAC 20 Hazardous Air Pollutants

No Hazardous Air Pollutants are expected to be emitted from this operation. As a result, no provisions of 326 IAC 20 are applicable to this source.

Compliance Monitoring

1. Central Soya did not specifically agree to but proposed and submitted December 11, 1996, CD Forms listing suggested Compliance Monitoring conditions to ensure compliance with FESOP limitations. Emission Unit ID R1 (No. 1 Receiving) and Emission Unit ID R2 (No. 2 Receiving) have applicable compliance monitoring conditions as specified below:
 - a) The total static pressure drop across the baghouse measured and recorded once per week. The pressure drop for the unit shall be maintained within the normal operating range. If the pressure drop is outside this range, corrective action per the required Preventive Maintenance Plan will commence.
 - b) Daily visible emissions observations shall be performed in accordance with 40 CFR 60, Appendix A, Method 22. If observed opacity is greater than 30 %, corrective action will be implemented per the Preventive Maintenance Plan.
 - c) A monthly record of twelve (12) month rolling average amount of grain received shall be maintained and limited to 15 million bushels per rolling twelve (12) month period.

These monitoring conditions are necessary to ensure compliance with 326 IAC 5-1 opacity limit of 30%, 326 IAC 6-1-12 SIP limits, 326 IAC 6-4 and FESOP PM10 limited tons per year.

2. Central Soya did not specifically agree to but proposed and submitted December 11, 1996, CD Forms listing suggested Compliance Monitoring provisions to ensure compliance with FESOP limitations. Emission Unit ID TE (Tripper Equipment East & West) and Emission Unit ID LE (Elevator Gallery Belt Loading Equipment) have applicable compliance monitoring conditions as specified below:
 - a) The total static pressure drop across the baghouse measured and recorded once per week. The pressure drop for the unit shall be maintained within the normal operating range. If the pressure drop is outside this range, corrective action per the required Preventive Maintenance Plan will commence.

- b) Daily visible emissions observations shall be performed in accordance with 40 CFR 60, Appendix A, Method 22. If observed opacity is greater than 30 %, corrective action will be implemented per the Preventive Maintenance Plan.
- c) A visual check shall be performed once per shift to ensure that soybean oil is being sprayed on received grain. The application rate shall be maintained at no less than 1 gallon per 1000 bushels of grain received. If examination of nozzle indicates clogging or spraying at a lower application rate than 1 gallon per 1000 bushels received, corrective action will be implemented per the Preventive Maintenance Plan.
- d) A monthly record of twelve (12) month rolling average amount of grain received and processed shall be maintained and limited to 15 million bushels per rolling twelve (12) month period. A monthly record of the amount of soybean oil applied to received grain shall be recorded and reported on a quarterly basis.

These monitoring conditions are necessary to ensure compliance with 326 IAC 5-1 opacity limit of 30%, 326 IAC 6-1-12 PM SIP limits, 326 IAC 6-4 and FESOP PM10 limited tons per year.

3. Central Soya did not specifically agree to but proposed and submitted December 11, 1996, CD Forms listing suggested Compliance Monitoring provisions to ensure compliance with FESOP limitations. Emission Unit ID BBC (Bean Bowl Conveying), BBL (Bean Bowl Leg) and BBSR (Bean Bowl Storage and Removal) have applicable compliance monitoring conditions as specified below:

- a) Daily visible emissions observations shall be performed in accordance with 40 CFR 60, Appendix A, Method 22. If observed opacity is greater than 30 %, corrective action will be implemented per the Preventive Maintenance Plan.
- c) A visual check shall be performed once per shift to ensure that soybean oil is being sprayed on received grain. The application rate shall be maintained at no less than 1 gallon per 1000 bushels of grain received. If examination of nozzle indicates clogging or spraying at a lower application rate than 1 gallon per 1000 bushels received, corrective action will be implemented per the Preventive Maintenance Plan.
- d) A monthly record of twelve (12) month rolling average amount of grain received and processed shall be maintained and limited to 5 million bushels per rolling twelve (12) month period. A monthly record of the amount of soybean oil applied to received grain shall be recorded and reported on a quarterly basis.

These monitoring conditions are necessary to ensure compliance with 326 IAC 5-1 opacity limit of 30%, 326 IAC 6-3-2, 326 IAC 6-4 and FESOP limited PM10 tons per year.

4. Central Soya did not specifically agree to but proposed and submitted December 11, 1996, CD Forms listing suggested Compliance Monitoring provisions to ensure compliance with FESOP limitations. Emission Unit ID GD (Grain Dryer) has applicable monitoring conditions as specified below:

- a) Daily visible emissions observations shall be performed in accordance with 40 CFR 60, Appendix A, Method 22. If observed opacity is greater than 30 %, corrective action will be implemented per the Preventive Maintenance Plan.

- b) A monthly record of twelve (12) month rolling average amount of grain dried shall be maintained and limited to 2 million bushels per rolling twelve (12) month period. A monthly record of the amount of grain dried shall be recorded and reported on a quarterly basis.

These monitoring conditions are necessary to ensure compliance with 326 IAC 5-1 opacity limit of 30%, 326 IAC 6-3-2, 326 IAC 6-4 and FESOP limited PM10 tons per year.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 189 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application GSD-08.

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.

Conclusion

The operation of this grain elevator will be subject to the conditions of the attached proposed **FESOP No. F097-5485-00008**.

Table (1)

Stack/Vent ID: R1 & R2				
Stack/Vent Dimensions: R1 Ht:82 ft Dia: 6 x 1.5 ft Temp: Ambient Flow: 32000 acfm				
R2 30 ft 4.5 x 2.5 Ambient 22000 acfm				
Emission Unit: No. 1 & No. 2 Truck & Rail Receiving				
Date of Construction: 1949 &1964				
Alternative Scenario: None				
Pollution Control Equipment: baghouse on each				
General Description of Requirement:	PM	PM10		
Numerical Emission Limit:	0.006 gr/dscf 7.23 tons/yr (R1) & 4.95 tons/yr (R2)	7.23 tons/yr (R1) & 4.95 tons/yr (R2)		
Regulation/Citation:	326 IAC 6-1-12	326 IAC 2-8		
Compliance Demonstration:	baghouse/ recordkeeping	baghouse/ recordkeeping		
PERFORMANCE TESTING				
Parameter/Pollutant to be Tested:	none	none		
Testing Method/Analysis:				
Testing Frequency/Schedule:				
Submittal of Test Results:				
COMPLIANCE MONITORING				
Monitoring Description:	opacity/pressure drop	opacity/pressure drop		
Monitoring Method:	Method 22/visual	Method 22/visual		
Monitoring Regulation/Citation:	326 IAC 1-6	326 IAC 2-8		
Monitoring Frequency:	daily/weekly	daily/weekly		
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	PM/throughput	PM10/throughput		
Recording Frequency:	monthly	monthly		
Submittal Schedule of Reports:	quarterly	quarterly		
REPORTING REQUIREMENTS				
Information in Report:	amount bushels received/emissions	amount bushels received/emissions		
Reporting Frequency/Submittal:	monthly/quarterly	monthly/quarterly		

Additional Comments:				
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Table (2)

Stack/Vent ID: TE, LE & GDCS				
Stack/Vent Dimensions: TE Ht:130ft Dia: 0.9 ft Temp: Ambient Flow: 4500 acfm				
LE 130ft 0.9 ft Ambient 1500 acfm				
GDCS 150ft 2.1ft Ambient 4500 acfm				
Emission Unit: Tripper Equipment (East & West); Loader Equipment				
Date of Construction: 1949				
Alternative Scenario: None				
Pollution Control Equipment: Four (4) baghouses				
General Description of Requirement:	PM	PM10		
Numerical Emission Limit:	0.006 gr/dscf 0.92 tons/yr (TE) 0.70 tons/yr (LE) 1.01 tons/yr (GDCS)	0.92 tons/yr (TE) 0.70 tons/yr (LE) 1.01 tons/yr (GDCS)		
Regulation/Citation:	326 IAC 6-1-12	326 IAC 2-8		
Compliance Demonstration:	baghouse/ recordkeeping	baghouse/ recordkeeping		
PERFORMANCE TESTING				
Parameter/Pollutant tested:	none	none		
Testing Method/Analysis:				
Testing Frequency/Schedule:				
Submittal of Test Results:				
COMPLIANCE MONITORING				
Monitoring Description:	opacity/pressure drop	opacity/pressure drop		
Monitoring Method:	Method 22/visual	Method 22/visual		
Monitoring Regulation/Citation:	326 IAC 1-6	326 IAC 2-8		
Monitoring Frequency:	daily/weekly	daily/weekly		
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	PM/throughput/oil spray amount	PM10/throughput/oil spray amount		
Recording Frequency:	monthly	monthly		
Submittal Schedule of Reports:	quarterly	quarterly		
REPORTING REQUIREMENTS				

Information in Report:	amount bushels thru/oil spray amount/emissions	amount bushels received/oil spray amount/emissions		
Reporting Frequency/Submittal:	monthly/quarterly	monthly/quarterly		
Additional Comments:				

Table (3)

Stack/Vent ID: BBC, BBL & BBSR				
Stack/Vent Dimensions: NA				
Emission Unit: Bean Bowl Conveying, Loading, Storage & Removal				
Date of Construction: 1964				
Alternative Scenario: None				
Pollution Control Equipment: Oil addition to received grain @ 1 gal/1000 bushels received				
General Description of Requirement:	PM	PM10		
Numerical Emission Limit:	process weight rate	2.4 tons/yr		
Regulation/Citation:	326 IAC 6-3-2	326 IAC 2-8		
Compliance Demonstration:	opacity/oil addition/record keeping	opacity/oil addition/recordkeeping		
PERFORMANCE TESTING				
Parameter/Pollutant tested:	none	none		
Testing Method/Analysis:				
Testing Frequency/Schedule:				
Submittal of Test Results:				
COMPLIANCE MONITORING				
Monitoring Description:	opacity/oil addition/throughput	opacity/oil addition/throughput		
Monitoring Method:	Method 22/visual	Method 22/visual		
Monitoring Regulation/Citation:	326 IAC 1-6	326 IAC 2-8		
Monitoring Frequency:	daily/weekly	daily/weekly		
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	PM/throughput/oil spray amount	PM10/throughput/oil spray amount		
Recording Frequency:	monthly	monthly		
Submittal Schedule of Reports:	quarterly	quarterly		
REPORTING REQUIREMENTS				
Information in Report:	amount bushels thru/oil spray amount	amount bushels received/oil spray amount		

Reporting Frequency/Submittal:	monthly/quarterly	monthly/quarterly		
Additional Comments:				

Table (4)

Stack/Vent ID: GD				
Stack/Vent Dimensions: GD Ht:23ft Dia: 6 x 25 ft Temp: 150 F Flow: 5000 acfm				
Emission Unit: Grain Dryer				
Date of Construction: 1949				
Alternative Scenario: None				
Pollution Control Equipment: Screen				
General Description of Requirement:	PM	PM10		
Numerical Emission Limit:	process weight rate	1.65 tons/yr		
Regulation/Citation:	326 IAC 6-3-2	326 IAC 2-8		
Compliance Demonstration:	recordkeeping	recordkeeping		
PERFORMANCE TESTING				
Parameter/Pollutant tested:	none	none		
Testing Method/Analysis:				
Testing Frequency/Schedule:				
Submittal of Test Results:				
COMPLIANCE MONITORING				
Monitoring Description:	opacity	opacity		
Monitoring Method:	Method 22/visual	Method 22/visual		
Monitoring Regulation/Citation:	326 IAC 1-6	326 IAC 2-8		
Monitoring Frequency:	daily	daily		
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	PM/throughput	PM10/throughput		
Recording Frequency:	monthly	monthly		
Submittal Schedule of Reports:	quarterly	quarterly		
REPORTING REQUIREMENTS				
Information in Report:	amount bushels thru	amount bushels thru		
Reporting Frequency/Submittal:	monthly/quarterly	monthly/quarterly		
Additional Comments:				

Table (5)

Stack/Vent ID: EGLO				
Stack/Vent Dimensions: NA				
Emission Unit: Elevator Grain Loadout				
Date of Construction: 1964				
Alternative Scenario: None				
Pollution Control Equipment: Shed/oil				
General Description of Requirement:	PM	PM10		
Numerical Emission Limit:	process weight rate	0.34 tons/yr		
Regulation/Citation:	326 IAC 6-3-2	326 IAC 2-8		
Compliance Demonstration:	recordkeeping	recordkeeping		
PERFORMANCE TESTING				
Parameter/Pollutant tested:	none	none		
Testing Method/Analysis:				
Testing Frequency/Schedule:				
Submittal of Test Results:				
COMPLIANCE MONITORING				
Monitoring Description:	opacity/oil addition/throughput	opacity/oil addition/throughput		
Monitoring Method:	Method 22/visual	Method 22/visual		
Monitoring Regulation/Citation:	326 IAC 1-6	326 IAC 2-8		
Monitoring Frequency:	daily	daily		
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	PM/throughput	PM10/throughput		
Recording Frequency:	monthly	monthly		
Submittal Schedule of Reports:	quarterly	quarterly		
REPORTING REQUIREMENTS				
Information in Report:	amount bushels thru	amount bushels thru		
Reporting Frequency/Submittal:	monthly/quarterly	monthly/quarterly		
Additional Comments:				

**Office of Air Management
and
City of Indianapolis
Environmental Resources Management Division**

Addendum to the
Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)

Source Name:	Central Soya Company, Incorporated
Source Location:	1102 West 18th Street, Indianapolis, Indiana 46244
County:	Marion
SIC Code:	5153
Operation Permit No.:	F097-5485-00008
Permit Reviewer:	M. Caraher

On May 16, 1997, the Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star Newspaper in Indianapolis, Indiana, stating that Central Soya Company, Incorporated had applied for a Federally Enforceable State Operating Permit (FESOP) relating to the operation of a grain terminal under an SIC of 5153. The notice also stated that ERMD proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

During the thirty (30) day public notice period, ERMD received written comments from Central Soya Company, Incorporated and the Indiana Department of Environmental Management (IDEM). Central Soya provided written comments June 12, 1997. IDEM commented on numerous occasions throughout the public comment period. USEPA Region V provided written comments on September 3, 1997. All of the IDEM public notice comments and USEPA Region V comments pertained to the proposed issuance of a FESOP with PM limits, in tons per year, that were higher than what the current State Implementation Plan (SIP) under 326 IAC 6-1-12 would allow.

On January 14, 1998, IDEM provided guidance that the any draft FESOP, even one currently on or off public notice, should follow the updated revisions to the draft FESOP model of January 14, 1998.

On February 4, 1998, the Indiana Air Pollution Control Board approved final adoption of the requested PM SIP revisions, effective thirty (30) days after filing with the Indiana Secretary of State. ERMD prepared a revised proposed FESOP for internal IDEM review in anticipation of the SIP revision effective date. The revisions to the public notice FESOP version pertained to comments received from Central Soya, IDEM and USEPA as well as the incorporation of the language of the 1/14/98 FESOP model. The revised public notice FESOP was resubmitted to IDEM on February 4, 1998 for IDEM internal review prior to issuance.

ERMD received comments on February 18, 1998 from IDEM. IDEM commented on issues not previously raised by IDEM during the public notice period. In addition, there have been FESOP model language updates made by IDEM to the model that were made on June 5, July 10, 1998 and November 19, 1998.

ERMD response to these paraphrased comments are stated below along with the following changes to the FESOP:

Public Notice Version FESOP Comments

Comment # 1 IDEM and USEPA Region V stated that a FESOP containing PM limits higher than what is currently allowed under 326 IAC 6-1-12 should not be issued.

Response: Central Soya Company, Incorporated initiated the PM SIP Revision process with IDEM by submitting the necessary revision information to IDEM on June 8, 1995. IDEM published in the August 1, 1995 Indiana Register the First Notice of Comment Period for the proposed PM SIP revision. March 15, 1996 Central Soya submitted a FESOP application containing the requested but, as yet, unrevised SIP limitations as limits on potential to emit. On August 1, 1996 IDEM had a Notice of First Hearing published in the Indiana Register. On March 27, 1997, Central Soya submitted a modeling study "Ambient Impact Demonstration: Proposed Particulate Matter SIP Revision" to show no PM ambient air impacts from the proposed revision. On May 12, 1997, a draft FESOP containing the requested PM SIP limits was public noticed. On August 1, 1997, a Second Notice for Comment Period was published in the Indiana Register for the requested revised PM SIP limits. On February 4, 1998 the Indiana Air Pollution Control Board had Final Adoption of the requested revisions effective thirty (30) days after filing with the Secretary of State.

Central Soya Company, Incorporated proposed in their FESOP application the requested PM SIP limits as the limit on potential to emit for facilities specifically listed in 326 IAC 6-1-12. Potential PM and PM10 emissions would have exceeded the applicable major source threshold barring FESOP/SIP limitation(s) on potential to emit. The application, as proposed, was practical in the sense that listed Emission Units more accurately described operations at the plant at this point in time. Many of the previous SIP points had either been removed or demolished, did not accurately depict the current configuration of the source and were not included in the FESOP application. It was not the intent of ERMD to issue a FESOP with PM SIP limits higher than an, as yet, unrevised SIP. It was the intent of ERMD to notice a FESOP that was in line with the current configuration of the source and also to propose a FESOP that would not have to be modified when the SIP was revised. Otherwise, the FESOP application would have to have been modified to describe Emission Units as related to previous and existing PM SIP limits under 326 IAC 6-1-12. With final adoption of the amended SIP on February 4, 1998 (effective 30 days after filing with the Secretary of State), the public notice FESOP can be issued with the necessary changes pursuant to the January 14, 1998 IDEM model for FESOPs.

Comment # 2: Central Soya Company, Incorporated indicated that a routine operation in the grain elevator is to turn the grain occasionally. It will be assumed that the FESOP does not restrict grain turning.

Response: Guidance found in AP-42 Table 9.9.1-2 Interim Uncontrolled Particulate Emission Factors for Grain Elevators which were used to estimate potential emissions indicate that the emission factors consider only a one time movement of grain into and out of the plant. Emissions resulting from movement of grain between storage bins are not reflected in these factors because the number of such movements varies from one elevator to another.

However, the revised PM SIP for Tripper Equipment (Emission Unit ID TE), Loader Equipment (Emission Unit ID LE) and the Grain Dryer Conveyance System (Emission Unit ID GDCS) includes the limit of 0.006 gr/dscf. These activities comprise internal operations and a compliance demonstration is shown in the Technical Support Document Appendix A on Page 4 of 5. Therefore, compliance with the short term limit in gr/dscf should be demonstrated at all times whether grain was previously moved through these operations or not. Central Soya Company, Incorporated specifically requested the long term emissions in tons per year.

Comment # 3: In the May 12, 1997 public notice FESOP, Condition C.5 Fugitive Particulate Matter Emission Limitations is in place. Central Soya believes this regulation was submitted to USEPA for approval but was disapproved. This requirement should be a State enforceable requirement only.

Response: Emission Unit ID R1, R2, and Emission Unit ID Elevator Grain Loadout comprise activities that could have emissions deemed "fugitive" (in the sense that a segment of these emissions are escaping capture). With the effects of oil spray addition and baghouse control on R1 and R2, source wide potential fugitive PM emissions do not exceed 25 tons per year and, as a result, it appears that 326 IAC 6-5 is not applicable. CD Forms submitted by the source indicate that 326 IAC 6-5 is not applicable. Requirements for a Fugitive Dust Control Plan have been deleted in the FESOP. This requirement is deleted from Section C.5. Remaining Section C Conditions are renumbered.

Comment # 4: Central Soya Company, Incorporated commented that the annual emission limitations for Emission Unit ID R1 and R2 apply only to emissions from the receiving baghouse Stack/Vent ID R1 and Stack/Vent ID R2. Fugitive emissions from receiving operations will not be included in the calculations performed to demonstrate compliance with the permitted annual emission limitations but will be quantified for the annual emission report.

Comment # 5: Central Soya Company, Incorporated commented that the annual emission limitation for PM10 is equivalent to the annual emission limitation for PM. The PM10 emission limitation is acceptable, however, actual emissions for the purposes of demonstrating compliance will take in to account that PM10 is only a portion of PM. The interim emission factors assume that PM10 is 25% of PM.

Response: The annual PM emission limitations in the SIP are point source emission limitations and do not include fugitive emissions. The SIP/FESOP limitation does not include fugitive emissions. The source is no longer required, by this FESOP, to submit an annual emission statement under 326 IAC 2-6 (Emission Reporting) but would be required to submit an annual compliance certification under 326 IAC 2-8-5(a)(1) and Section B.12 of this FESOP.

ERMD has set PM10 limitations equal to the PM SIP limitation(s) for a number of points in the FESOP. Theoretically, the source should be allowed to emit up to 99.0 tons per year of PM10. However, PM10 is a subset of PM and the SIP sets PM limits much lower than the major source threshold. PM10 emission factors may be lower than PM emission factors for the same activity, however, ERMD does not want to imply that an emission factor is a federally enforceable limitation and does not want to restrict, without basis, PM10 emissions to a second set of limitations more restrictive than the PM allowable limit. Therefore, ERMD has set PM10 limitations equivalent to PM limitations allowing the source to stay below the major source threshold.

Comment # 6: Central Soya commented that the range of pressure drop readings should be changed from 3.0 to 6.0 inches of water to 1.0 to 10.0 inches of water. It is not uncommon for a baghouse with new bags to indicate 1.0 inches of water.

Response: The range of pressure drop readings has been changed to 1.0 to 10.0 inches of water for new FESOP Sections D.1.8 and D.2.7. Initial review indicated that the manufacturers may have recommended between 3.0 and 6.0 inches of water. However, Central Soya Company, Incorporated has indicated that normal operation requires this change.

Comment # 7: Central Soya commented that under the condition Broken Bag or Failure Detection for R1 and R2 in Section D.1 and for TE, LE and GDCS in Section D.2, ERMD should modify the requirement to devise a plan for additional corrective actions from "eight hours" to "eight business hours."

Response: The FESOP requirements have been amended to include "eight business hours" in new FESOP Sections D.1.11 and D.2.10. The November 19, 1998 IDEM model FESOP also amended this condition with new language. The condition(s) now state:

D.1.11 Broken or Failed Bag Detection

In the event that bag failure has been observed,

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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.14 - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B.14 - Emergency Provisions).

Comment # 8: Central Soya Company, Incorporated indicated that the previous Condition Oil Spray Addition should be modified to state that the once per shift visual check will be performed only during periods that grain is being received.

Response: ERMD understands that grain receiving is intermittent not only during a shift but over longer time periods as well. For this reason, this condition has been amended to include the wording during periods that grain is being received. The new condition states:

D.1.12 Oil Spray Application

A visual check shall be performed once per shift during periods that grain is being received to ensure that food grade oil is being spray applied to all received grain. The application rate shall be maintained at no less than one (1) gallon of food grade oil spray applied per 1000 bushels of grain received. If examination of the nozzles indicates clogging or spraying at a lower than specified application rate, corrective action will be implemented per the Preventive Maintenance Plan.

Comment # 9: Central Soya stated that Grain Dryer description should be modified to indicate plate perforation diameter of "less than 0.094 inches" similar to the NSPS description. Also, delete the reference to the screen. The emission estimates are based on the interim factor for column dryers.

Response: The description of the Grain Dryer under Section D.3 and under Condition A.2 has been amended to state:

Facility Description [326 IAC 2-8-4(10)] One (1) Berico Column Grain Dryer designated as Emission Unit ID GD. Maximum rated capacity of 45 tons of grain dried per hour. Plate perforation diameter of less than 0.094 inches. A maximum of 50,000 acfm exhausted from Emission Unit ID GD. Equipped with a 14.5 million Btu per hour natural gas fired drying equipment. Throughput restricted to two (2) million bushels of grain dried per rolling twelve (12) consecutive month period. Installation date of 1949.

Comment # 10: Central Soya Company, Incorporated commented the PM10 emission limitation for Emission Unit ID BBC, BBL and BBSR has been calculated by ERMD in a different manner than the application. The limitation is acceptable and the calculation methodology employed by ERMD will also be used by Central Soya to demonstrate compliance.

Response: ERMD considered this activity much like the interim emission factor for internal operations where one emission factor is applied to the total sum of grain moved into and out of a bin. Bean Bowl calculations supplied by Central Soya had the internal operations emission factor multiplied three times for filling and unloading the Bean Bowl. The interim emission factor was already supposed to include filling and unloading of a bin. No changes.

Comment # 11: Central Soya Company, Incorporated indicated that the Deviation Occurrence Report Form previously appearing on Page 36 of the May 12, 1997 FESOP asks for percent of time in deviation which is not measured in a fashion accurate enough to be beneficial.

Response: Per IDEM guidance, the Deviation Occurrence Report Form has been replaced by a two page reporting form included as a revision of the January 14, 1998 IDEM FESOP model. The new form does not include percent of time in deviation. The new report form is entitled Emergency/Deviation Occurrence Report and is found on page 46 and 47 of the revised FESOP. The new form is:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

P.O. Box 6015
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and

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

2700 S. Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
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**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Central Soya Company, Incorporated
Source Address: 1102 West 18th Street, Indianapolis, Indiana 46244
Mailing Address: 1102 West 18th Street, Indianapolis, Indiana 46244
Part 70 Permit No.: F097-5485-00008

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the ERMD and OAM, within four (4) business hours; and
CThe Permittee must submit notice in writing or by facsimile to ERMD and OAM within two (2) days, and follow the other requirements of 326 IAC 2-8-12

9 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C)
CThe Permittee must submit notice in writing within ten (10) calendar days

if any of the following are not applicable mark NA

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

if any of the following are not applicable mark NA

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

IDEM Comments to the Draft FESOP Following Comment Period Revisions

Comment # 1: Suzanne Whitmer of IDEM, OAM stated that the promulgation process for the PM SIP Revision, approved and final adopted by the Indiana Air Pollution Control Board on February 4, 1998, would delay the effective date of the PM SIP Revision and that the FESOP should not be issued until the promulgation process has been completed and the effective date has passed. As stated in the November 1, 1998 Indiana Register, the PM SIP Revision that was final adopted on February 4, 1998 was filed with the Indiana Secretary of State's Office on September 18, 1998. Therefore, the effective date of the PM SIP Revision was October 18, 1998 and that an approved draft FESOP could be issued any date after October 18, 1998.

Response: With the effective date of the PM SIP Revision of October 18, 1998, ERMD is now repropounding the draft FESOP for issuance. IDEM and USEPA public notice comments were entirely about the SIP Revision. Comments received on or after February 18, 1998 involved model update revisions, equipment descriptions, PM limitations, 326 IAC 1-7 (stack height) clarification and stack testing.

Comment # 2: IDEM commented that reference to air pollution control equipment control efficiencies should be deleted from Section A.2 Emission Units and Pollution Control Equipment Summary and from each Emission Unit ID description in each Section D of the permit.

Response: Reference to pollution control equipment control efficiency has been deleted from each Emission Unit ID description in Section A.2 and Sections D.1, D.2, D.4 and D.5 of the permit. In addition, there is now no reference to the effectiveness, as a control efficiency rating, of oil spraying to all grain received as previously stated in Section A.2, D.1, D.2, D.4 and D.5.

Comment # 3: Iryn Calilung of IDEM, OAM commented that all facilities listed in 326 IAC 6-1-12 should have a requirement to stack test PM emissions because these limitations were revised during the formal SIP revision process. These facilities are Emission Unit ID R1, R2, TE, LE and GDCS.

Response: The SIP revision did not revise short term PM emission limitations stated in gr/dscf. Only the ton per year limitations for these 326 IAC 6-1-12 listed facilities were revised. PM stack testing may verify compliance with a short term emission limit. The FESOP was not proposed by ERMD with a requirement to stack test facilities within the five (5) year valid date of the FESOP because short term limits were not revised and stack testing requirements for these facilities did not conform to the IDEM, OAM October 4, 1996 FESOP Stack Testing Criteria memorandum. The question of whether or not to stack test was answered by IDEM staff that this scenario did not meet the criteria of the Memorandum and a requirement to test within the five (5) year period of a permit would be an arbitrary decision based on any projected noncompliance issues which there are none. No changes.

Comment # 4: Iryn Calilung of IDEM, OAM commented that all facilities listed in each Section D of the proposed permit that are not specifically listed in 326 IAC 6-1-12, including Insignificant Activities as stated in Section D.6 of the proposed FESOP, should have an applicable short term PM emission limit of 0.03 gr/dscf. Ms. Calilung stated that 326 IAC 6-1-2(a) is applicable to sources **or** facilities in nonattainment counties that have actual PM emissions in excess of ten (10) tons per year. Ms. Calilung stated that because the Grain Dryer, the

Bean Bowl, Elevator Grain Loadout and Bin Vents are not listed in 326 IAC 6-1-12 and because source wide emissions exceed ten (10) actual tons per year, these facilities are then regulated by 326 IAC 6-1-2(a). The FESOP should not be issued with the currently stated process weight rate limitations.

Response: The Grain Dryer, Emission Unit ID GD, and the Elevator Grain Loadout, Emission Unit ID EGLO, are each not a listed facility in 326 IAC 6-1-12. Both Emission Unit ID's were previously permitted facilities and each are not classified as CWOP/OWOP. Each of these facilities has been in existence prior to 1968. Previous permitting of the grain dryer did not list any gr/dscf limitation. Previous permitting of Emission Unit ID EGLO did not have a grain/dscf limit.

The Bean Bowl, Emission Unit ID BBC, BBL and BBSR, was previously listed in 326 IAC 6-1-12 but was taken out of the SIP in the latest revision to the SIP effective October 18, 1998. The Bean Bowl was not included in the most recent permit issuance to Central Soya prior to Part 70 Permit Program applicability. The Bean Bowl was identified by Central Soya in their initial FESOP application as a CWOP/OWOP facility. Central Soya claimed Limited Liability for restarting this facility on Form GSD-01. ERMD does not believe that reactivation of this facility triggers any NSPS applicability under 40 CFR Part 60 Subpart DD. (see TSD Appendix A page 2 of 5).

In addition, the source claims that the oiling of grain received renders the previously existing baghouse on the Bean Bowl, that has now since been removed, ineffective as little or no dust was being collected. Central Soya now claims that Bean Bowl operations should be considered as a fugitive dust issue. ERMD does not believe, at this time, that a previously controlled facility should be treated as a fugitive dust issue given fugitive emissions are emissions that could not reasonably pass through a stack.

The Bin Vents are claimed as an Insignificant Activity and are found in Section D.6 of the proposed FESOP. Category # 52 on Form GSD-10(a) has been indicated by Central Soya that activities present at the source include "Bin aspiration (based on 0.005 gr/dscf) has emissions of particulate matter less than the threshold listed above (PM emissions less than 5 pounds per hour or 25 pounds per day)".

In response to comments about actual facility and source wide emissions, the TSD Appendix A has been revised and now includes a page 5 of 5. Previously, only 4 pages were in Appendix A and these have been renumbered to now state page(s) 1 through 5. Page 5 of 5 lists a STEPS emissions report summary compiled from STEPS reports submitted by Central Soya for calendar year 1995 and 1996 actual emissions. Actual source wide emissions have been reported to be in excess of 10 tons of PM per year. Although the Bean Bowl lists actual PM emissions for 1996 of 16.8 tons per year, no specific facility is in excess of 10 tons per year of actual emissions. In its application and in the STEPS report, Central Soya utilizes an AP-42 internal grain handling emission factor three times for this activity to account for conveying to the Bean Bowl, storage emissions and retrieval emissions. AP-42 guidance indicates that a one time use of the emission factor should account for conveying, storage and removal. Calculations for the FESOP public notice permit and this proposed permit do not utilize the emission factor three times for Bean Bowl activity. The source reviewed this assessment during the public notice period and agreed that FESOP application emissions estimates should actually be three times less than the stated emissions. As a result, actual emissions are estimated to be three times less than the STEPS reported value which would yield an adjusted estimate of 16.8/3.0 or 5.6

tons per year. Central Soya requested a FESOP throughput limitation of less than 5.0 million bushels per year which would yield, based on emission factors, a FESOP limited potential to emit PM from the Bean Bowl of 9.38 tons per year.

The source has historically had a limited potential to emit PM of greater than 100 tons per rolling twelve (12) consecutive month period and has had greater than ten (10) tons of actual PM emissions per rolling twelve (12) consecutive month period source wide. As a result, it would appear that 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations: Specified) would apply to any PM emitting facility not specifically stated in 326 IAC 6-1-12 and not specifically stated in 326 IAC 6-1-2(b) through (g). 326 IAC 6-1-2(d)(2) applies to any grain elevator in excess of 2.5 million bushels storage capacity. As a result, the process weight rate allowable PM limitations as stated in Section D.3, D.4, D.5 and D.6 has been deleted and replaced with 0.03 gr/dscf. The 20% opacity standard of 326 IAC 6-1-2(d)(2)(C) and the compliance determination/compliance monitoring provisions of 326 IAC 6-1-2(d)(2) have been added to each Section D of the FESOP (see changes under Section D of this TSD Addendum following this response).

Comment # 5: Since the receipt of IDEM internal review comments of February 18, 1998, there have been FESOP model revisions of June 5, July 10, 1998 and November 19, 1998. Any draft FESOP, on or off public notice should incorporate these model revisions.

Response: The public notice FESOP of May 16, 1997 has been revised to incorporate language from IDEM's January 14, 1998, June 5, 1998, July 10, 1998 and November 19, 1998 draft model FESOP revisions. These revisions are as follows:

Cover (Title) Page and Table of Contents

The title page and the Table of Contents of the January 14, 1998, June 5, 1998, July 10, 1998 FESOP and November 19, 1998 model have replaced the previous title page and Table of Contents to reflect the new outline of the permit.

Section B Changes

Section B of the January 14, 1998, June 5, 1998, July 10, 1998 and November 19, 1998 FESOP model has replaced the previous Section B in its entirety to reflect the requirements found in the updated model permit.

No new provisions are implemented with the replacement of Section B.

Section C Changes

Section C of the January 14, 1998, June 5, 1998, July 10, 1998 and November 19, 1998 FESOP model has replaced the previous Section C in its entirety to reflect the requirements found in the updated model permit. Except for Section C Condition C.18 General Reporting Requirements, no new provisions are implemented with this replacement.

Condition C.18 Changes

The new General Reporting Requirements Condition C.18 requires a Quarterly Compliance Monitoring Report be submitted which would report any deviations that may have occurred during the quarter being reported. A new Quarterly Compliance Monitoring Report Form now appears in the FESOP on page 52. The new Condition C.18 now states:

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

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B.15-Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Section D Changes

The IDEM draft FESOP model utilized to prepare the public notice FESOP of May 12, 1997 did not have a Compliance Determination Section for any Section D Facility Operation Condition(s). The revisions to the model permit now include a Compliance Determination Section, if applicable. As a result, a Compliance Determination Section has been added to Section D.1, D.2, D.3, D.4. and D.5. A new Section D.6 Insignificant Activities and its own Compliance Determination Section now appears in the revised FESOP due to public comment. In addition, the opacity standard of 326 IAC 6-1-2(d)(2)(C) and Compliance Determination requirements found in 326 IAC 6-1-2(d)(2) have also been added. Renumbering of Conditions in each Section D has also been done to reflect the Compliance Determination Section additions. The additions for each Section D are as follows:

Section D.1

D.1.4 Visible Emissions [326 IAC 6-1-2(d)(2)(C)]

Visible emissions from Emission Unit ID R1 and Emission Unit ID R2 shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1 (Opacity Regulations).

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

D.1.7 Particulate Matter [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2), Particulate Matter (PM) emissions shall be considered in compliance provided that:

- a) Good housekeeping and equipment maintenance procedures, pursuant to 326 IAC 6-1-2(d)(2), are implemented,
- b) Emissions are minimized in receiving, handling and shipping operations by appropriate methods. These may include but need not be limited to dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,
- c) No visible accumulation of particulate matter beyond the plant property line, and
- d) Emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions) and IAPCB Regulation II-4 (Air Borne Particulate).

Section D.2

D.2.3 Visible Emissions [326 IAC 6-1-2(d)(2)(C)]

Visible emissions from Emission Unit ID TE, LE and GDSCS shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1 (Opacity Regulations).

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-8-5(1)]

Testing of Emission Unit ID TE, LE and/or GDCS is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

D.2.6 Particulate Matter [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2), Particulate Matter (PM) emissions shall be considered in compliance provided that:

- a) Good housekeeping and equipment maintenance procedures, pursuant to 326 IAC 6-1-2(d)(2), are implemented,
- b) Emissions are minimized in receiving, handling and shipping operations by appropriate methods. These may include but need not be limited to dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,
- c) No visible accumulation of particulate matter beyond the plant property line, and
- d) Emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions) and IAPCB Regulation II-4 (Air Borne Particulate).

Section D.3

D.3.3 Visible Emissions [326 IAC 6-1-2(d)(2)(C)]

Visible emissions from Emission Unit ID GD shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1 (Opacity Regulations).

Compliance Determination Requirements

D.3.5 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

D.3.6 Particulate Matter [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2), Particulate Matter (PM) emissions shall be considered in compliance provided that:

- a) Good housekeeping and equipment maintenance procedures, pursuant to 326 IAC 6-1-2(d)(2), are implemented,
- b) Emissions are minimized in receiving, handling and shipping operations by appropriate methods. These may include but need not be limited to dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,

- c) No visible accumulation of particulate matter beyond the plant property line, and
- d) Emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions) and IAPCB Regulation II-4 (Air Borne Particulate).

Section D.4

D.4.3 Visible Emissions [326 IAC 6-1-2(d)(2)(C)]

Visible emissions from Emission Unit ID EGLO shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1 (Opacity Regulations).

Compliance Determination Requirements

D.4.5 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

D.4.6 Particulate Matter [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2), Particulate Matter (PM) emissions shall be considered in compliance provided that:

- a) Good housekeeping and equipment maintenance procedures, pursuant to 326 IAC 6-1-2(d)(2), are implemented,
- b) Emissions are minimized in receiving, handling and shipping operations by appropriate methods. These may include but need not be limited to dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,
- c) No visible accumulation of particulate matter beyond the plant property line, and
- d) Emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions) and IAPCB Regulation II-4 (Air Borne Particulate).

Section D.5

D.5.3 Visible Emissions [326 IAC 6-1-2(d)(2)(C)]

Visible emissions from Emission Unit ID BBC, BBL and BBSR shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1 (Opacity Regulations).

Compliance Determination Requirements

D.5.4 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

D.5.5 Particulate Matter [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2), Particulate Matter (PM) emissions shall be considered in compliance provided that:

- a) Good housekeeping and equipment maintenance procedures, pursuant to 326 IAC 6-1-2(d)(2), are implemented,
- b) Emissions are minimized in receiving, handling and shipping operations by appropriate methods. These may include but need not be limited to dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,
- c) No visible accumulation of particulate matter beyond the plant property line, and
- d) Emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions) and IAPCB Regulation II-4 (Air Borne Particulate).

Section D.6 - Insignificant Activities

D.6.2 Visible Emissions [326 IAC 6-1-2(d)(2)(C)]

Visible emissions from Emission Unit ID Bin Vents shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1 (Opacity Regulations).

Compliance Determination Requirement

D.6.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of these facilities is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4(1).

D.6.4 Particulate Matter [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2), Particulate Matter (PM) emissions shall be considered in compliance provided that:

- a) Good housekeeping and equipment maintenance procedures, pursuant to 326 IAC 6-1-2(d)(2), are implemented,
- b) Emissions are minimized in receiving, handling and shipping operations by appropriate methods. These may include but need not be limited to dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,
- c) No visible accumulation of particulate matter beyond the plant property line, and
- d) Emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions) and IAPCB Regulation II-4 (Air Borne Particulate).

ERMD Comments to the Draft FESOP Following Comment Period Revisions

Section D.1 Changes

Comment # 6: ERMD commented following the updates to the public notice FESOP that a condition requiring record keeping of visual checks for spraying should be stated in the FESOP as well as a record keeping requirement for bushels received should be stated in the FESOP.

Response: Condition D.1.13 (c) and (d) have been added to the Record Keeping Requirements condition. The language inserted into Condition D.1.13 is as follows:

(c) To document compliance with Condition D.1.12, the Permittee shall maintain the following:

Daily records of visual checks performed once per shift during periods that grain is being received to ensure that food grade oil is being spray applied to all received grain at the application rate of no less than one (1) gallon of food grade oil spray applied per 1000 bushels of grain received.

(d) To document compliance with Condition D.1.1, D.1.2 and D.1.3, the Permittee shall maintain the following:

(1) A monthly record of the combined total amount of grain received, in bushels, by Emission Unit ID R1 and Emission Unit ID R2 per rolling twelve (12) consecutive month period.

(2) A monthly record of the amount of food grade oil, in gallons, that is spray applied to all received grain.

Section D.3 Changes

Comment # 7: ERMD commented following the updates to the public notice FESOP that a condition requiring record keeping of the amount of grain dried should be stated in the FESOP.

Response: Condition D.3.8 (b) has been added to the FESOP to provide a record keeping requirement of the amount of grain dried. The language inserted in Condition D.3.8 is as follows:

(b) A monthly record of the total amount of grain dried, in bushels, by Emission Unit ID GD per rolling twelve (12) consecutive month period.

Section D.4 Changes

Comment # 8: ERMD commented following the updates to the public notice FESOP that a condition requiring record keeping of the amount of grain shipped by EGLO should be stated in the FESOP.

Response: Condition D.4.8(b) has been added to the FESOP to provide a record keeping requirement of the amount of grain shipped. The language of Condition D.4.8 is now as follows:

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.7, the Permittee shall maintain records of daily visible emission notations of Emission Unit EGLO when grain shipping is in operation.
- (b) A monthly record of the total amount of grain shipped, in bushels, by Emission Unit ID EGLO per rolling twelve (12) consecutive month period.

Section D.5 Changes

Comment # 9: ERMD commented following the updates to the public notice FESOP that a condition requiring record keeping of the amount of grain throughput through the Bean Bowl should be stated in the FESOP.

Response: Condition D.5.7(b) has been added to the FESOP to provide a record keeping requirement of the amount of grain processed. The language of Condition D.5.7 is now as follows:

D.5.7 Record Keeping Requirements

- (a) To document compliance with Condition D.5.6, the Permittee shall maintain records of daily visible emission notations of Emission Unit BBC, BBL and BBSR when grain transferring is in operation.
- (b) A monthly record of the total amount of grain transferred, in bushels, by Emission Unit ID BBC, BBL and BBSR per rolling twelve (12) consecutive month period.

Section D.6 - Insignificant Activities

Comment # 10: Per IDEM guidance, all FESOPs should incorporate the changes to the FESOP model permit updates as of January 14, 1998, June 5, 1998, July 10, 1998 and November 19, 1998.

Response: The FESOP model version used to prepare the May 12, 1997 public notice did not have a Section D for Insignificant Activities with applicable requirements. The only Insignificant Activity that appears to have any applicable requirement(s) are bin vents. Central Soya Company, Incorporated indicated on GSD Form 10a the following:

Bin aspiration (based on 0.005 gr/dscf) has emissions of particulate matter of less than five pounds per hour or twenty five pounds per day.

There are numerous grain storage bins at the source all with varying process weight rates or capacities in tons and dependent upon the type of grain stored. None of the bins have any forced or induced draft fans. The new Section D.6 is inserted as follows:

SECTION D.6 FACILITY OPERATION CONDITIONS

Insignificant Activities

Process Activities - Bin Vents

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

D.6.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations: Specified), the allowable PM emission rate from bin vents shall not exceed 0.03 gr/dscf.

Reporting Forms Changes

Comment # 11: Per IDEM guidance, all FESOPs should incorporate the changes to the FESOP model updates as of January 14, 1998, June 5, 1998, July 10, 1998 and November 19, 1998.

Response: The Quarterly Compliance Monitoring Report is a new requirement of Condition C.18 General Reporting Requirements. The form for this new requirement has now been inserted in to the revised FESOP on page 52 and is as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Central Soya Company, Incorporated
Source Address: 1102 West 18th Street, Indianapolis, Indiana 46244
Mailing Address: 1102 West 18th Street, Indianapolis, Indiana 46244
FESOP No.: F097-5485-00008

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations in this reporting period."

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.		
Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

TSD Changes

Comment # 12: Per IDEM comment, all control efficiencies should be removed from equipment descriptions.

Response: Pursuant to IDEM comment all control equipment efficiencies and oil application efficiency is removed from the emission unit and pollution control device description.

Comment # 13: Per IDEM, the attainment status table should delete PM from the table.

Response: PM status has been removed from the table. The new table is:

Pollutant	Status (attainment or unclassifiable/ severe, moderate, marginal, or maintenance nonattainment)
PM-10	unclassifiable
SO ₂	attainment
OZONE	attainment
CO	attainment
NO ₂	attainment

Comment # 14: IDEM commented that under the State Rule Applicability Section of the public notice TSD, 326 IAC 1-7 (Stack Height Provisions) is applicable to this source not as stated to be not applicable.

Response: ERMD believes that 326 IAC 1-7 is initially applicable to this source. However 326 IAC 1-7-5 (Stack Height Provisions: Exemptions and Limitations) exempts the source from many of

the requirements. As a result, the TSD, by way of the TSD Addendum, is amended to state:

326 IAC 1-7 (Stack Height Provisions)

326 IAC 1-7 (Stack Height Provisions) is applicable to this source. 326 IAC 1-7-5 contains exemptions and limitations that this source may have. Although not required to do so by 326 IAC 1-7, Central Soya submitted March 27, 1997 a study entitled "Ambient Impact Demonstration: Proposed Particulate Matter SIP Revision" as a formal modeling study submitted in support of the PM SIP Revision that demonstrated there were no increases in ambient PM concentrations or NAAQS violation(s).

Comment # 15: IDEM commented that 326 IAC 6-1-2 PM limitations apply to all facilities not specifically listed in 326 IAC 6-1-12. In addition, the draft FESOP and TSD discuss applicability of 326 IAC 6-3-2 (Process Operations: Particulate Emission Limitations) which does not apply to this source.

Response: TSD Appendix A is amended to add a new page 5. Page 5 of 5 lists STEPS actual PM emissions for 1995 and 1996. Because source wide actual emissions exceed 10 tons per year, it appears that 326 IAC 6-1-2(a) is applicable. Because the grain loading limitation of 326 IAC 6-1-2(d)(1) applies to grain elevators with less than 2.5 million bushel storage capacity, it would appear that the applicable PM emission limit revert to 326 IAC 6-1-2(a). In addition, the compliance determination and monitoring provisions of 326 IAC 6-1-2(d)(2) apply to all grain elevators. The TSD is amended, by way of this addendum, by deleting all reference to 326 IAC 6-3-2 and adding a new rule applicable to the source as follows:

326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations: Specified)

Because actual source wide PM emissions exceed 10 tons per year (see TSD Appendix A page 5 of 5), all PM emitting facilities are limited, pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations: Specified) to 0.03 gr/dscf.

Comment # 16: ERMD noted following IDEM comments on 326 IAC 6-1-2(a) applicability that compliance determination for the facilities previously stated as having 326 IAC 6-3-2 PM limits (Emission Unit ID GD, EGLO and the Bean Bowl - Emission Unit ID BBC, BBL and BBSR) would have to be performed in order to demonstrate compliance with the PM limit. Compliance determination and monitoring for grain elevators is expressly stated in 326 IAC 6-1-2(d)(2) which is applicable to all grain elevators.

Response: The Compliance Monitoring Section of the TSD is amended, by way of this TSD Addendum, to add the following language for each Emission Unit at the source:

That particulate matter (PM) emissions shall be considered in compliance provided that:

- e) Good housekeeping and equipment maintenance procedures are implemented,
- f) Emissions are minimized in receiving, handling and shipping operations by appropriate methods. These may include but are not limited to dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,
- g) No visible accumulation of particulate matter beyond the plant property line, and
- h) Emissions do not violate IAPCB Regulation II-4 (Air Borne Particulate) and 326 IAC 6-4 (Fugitive Dust Emissions).

In addition, each Section D of the FESOP is amended to include this language in the Compliance Determination Section. Renumbering of each Section D was done with the addition.

A previous error was made in the Compliance Monitoring Section (the public notice FESOP had the correct language) of the TSD in regards to opacity. The TSD had called for Method 22 monitoring of opacity which was the previous draft model TSD model language at the time of initial preparation of a draft. This language has been replaced, by way of model revisions and this TSD Addendum, with normal/abnormal readings and is as follows:

- (a) Daily visible emission notations of the Stack/Vent ID_ and Stack/Vent ID_ stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

326 IAC 6-1-2(d)(2)(C) also contains an opacity limit of 20% to all affected areas at a grain terminal. A 20% opacity requirement has been added to each Section D of the FESOP with renumbering of the remaining Section D requirements.

Comment # 17: Central Soya Company, Incorporated indicated that 326 IAC 6-5 Fugitive Particulate Matter Emission Limitations may not be applicable to this source.

Response: See TSD Addendum Section C.5 Changes Comment # 3 and response.

Comment # 18: IDEM has indicated that whenever a TSD Addendum is compiled that the Limited PTE Table appear with each revision, modification or amendment. The change in the applicable PM short term limit from 326 IAC 6-3-2 to 326 IAC 6-1-2(a) did not change the requested long term PM limitations in tons per year for Emission Unit ID GD, BBC, BBL, BBSR and EGLO because the requested throughput limitation in bushels per year effectively limits long term tons per year emissions based on AP-42 interim emission factors (see TSD Appendix A page 2 of 5). The annual grain throughput limitations for grain receiving, Bean Bowl throughput, grain drying and Elevator grain loadout effectively limit PM10 emissions, in tons per year, to less than the major source threshold. Based on the current changes to the FESOP, there is no change in Limited PTE for Central Soya Company, Incorporated. However, the Limited PTE Table is listed below:

Process/ facility	Limited PTE (tons/year)						
	PM	PM-10	SO2	VOC	CO	NOx	HAPs
Emission Unit ID R1 Elevator No. 1 Truck Receiving System & Basement (SIP-10A)	7.23	7.23					
Emission Unit ID R2 Elevator No. 2 Truck & Rail Receiving System (SIP-10B)	4.95	4.95					
Emission Unit ID TE Tripper Equipment (SIP-9A)	0.92	0.92					
Emission Unit ID LE Loader Equipment (SIP-9B)	0.70	0.70					
Emission Unit ID GDCS Grain Dryer Conveyance System (SIP-9C)	1.01	1.01					
Emission Unit ID GD Grain Dryer	6.6	1.6					
Emission Unit ID GD Grain Dryer fuel combustion	0.9	0.9	0.0	0.2	2.2	8.9	
Emission Unit ID BBC, BBL & BBSR Bean Bowl (Conveying, Leg & Storage & Removal)	9.4	2.4					
Emission Unit ID EGLO Elevator Grain Loadout	1.2	0.4					
Insignificant Activities	0.0	0.0					
Total Emissions	32.9	20.1	0.0	0.2	2.2	8.9	

APPENDIX A

**Emission Calculation
Grain Elevator
Grain Terminal**

Company Name Central Soya
Address 1102 West 18th Street, Indianapolis, IN 46202
Plant ID F097-5485-00008
Reviewer M. Caraher
Date 10/17/96

Actual & Limited Throughput		
Throughput:	Actual bushels/yr	Potential bushels/yr
Corn	454754	15000000
Soybeans	3966194	15000000
Wheat		
Milo (Sorghum)		
Mixed		
Actual & Limited Throughput Grain Received (tons / year)		
	Potential	Actual
Corn	450000	13643
Soybeans	450000	118986
Wheat		
Milo		
Mixed		
amount grain dried	60000	60000
% received by truck	60.00%	
% received by rail	40.00%	
bean bowl storage/transfer	150000	150000

Grain	Dustiness Ratio	EM FACs	
		PM	PM10
	2.5		
Facility			
		lb/ton	lb/ton
Receiving			
	Y=1, N=0		
Truck	1	0.15	0.0375
Rail	1	0.15	0.0375
Barge	0	0	0
Drying			
Column	1	0.22	0.055
Rack	0	0	0
Internal Operations			
Cleaning, Tunnel Belt			
Gallery Belt, Headhouse (grouped)	1	0.825	0.2
Bin Vents			
	1	0.05	0.0125
Shipping			
Truck	1	0.0275	0.0075
Railcar	1	0.0275	0.0075
Barge	0	0	0
Ship	0	0	0
Bean Bowl			
internal op less cleaning emfac	1	0.625	0.16
Sum less bean bowl		1.45	0.3575

Grain	Dustiness Ratio	Density (Lbs/bushel)
Corn	2.5	60
Soybeans	2.5	60
Wheat	1	
Milo	1.75	
Mixed	1.95	

Emission factors are taken from AP-42 of Interim Section 9.9.1 Grain Elevators & Processes
 Table 9.9.1-2 shows Interim uncontrolled particulate emission factors for grain elevators
 Emfacs shown are Table 9.9.1-2 values times the dustiness ratio
 15 MM total through bushels/yr * 60 lbs/bushel * ton/2000 = 450,000 tons/yr (51 tons per hour if 8760 hours per year)
 5 MM total bean bowl bushels/yr * 60 lbs/bushel * ton/2000 = 150,000 tons/yr
 2 MM total grain dried bushels/yr * 60 lbs/bushel * ton/2000 = 60,000 tons/yr
 Bean bowl emfac does not include grain cleaning emfac from internal handling interim emfac; (0.72+0.06+1.74)/10*DR = 0.625 lb PM/ton & 25% is PM10 (0.16 lbs PM10/ton)

Un limited					
max tons per hour	max bushels per hour	max tons per year	max bushels per year	emis sions	
				tons PM per year	tons PM10 per year
450	15000	3942000	131400000	2857.95	704.63

According to 3/15/96 FESOP App, a total of 724 tons of grain/hr can be received. A max of 450 tons per hour can be loaded into silos. 450 ton/yr * 8760 hr/yr * 2000 #/ton * bushel/60 # = 131 MM bushels/yr. If no reasonable assumption on max capacity, 450 tons/hr * 0.3575 lb PM10/ton * 8760/2000 = 704 tpy PM10. Source elects to have 15 MM bushels through (5 MM bushels to bean bowl and 2 MM bushels dried) as max capacity to enforceably restrict PTE.

('Uncontrolled') Potential/Actual PM & PM 10 Emissions @ "Limited" Throughput

Emfac	Grain Receiving			Grain Drying		Internal Operations				Bin Vents		Bean Bowl		Grain Shipping			Totals
	Truck	Rail	Barge	Column	Rack	Cleaning	Tunnel Belt	Gallery Belt	Headhouse	Bin Vents	In/Out	Truck	Rail	Barge	Ship		
PM10	0.0375	0.0375	0	0.055	0	0	0.2	0	0	0.0125	0.16	0.0075	0.0075	0	0	71.59	
PM (lbs/ton)	0.15	0.15	0	0.22	0	0	0.825	0	0	0.05	0.625	0.0275	0.0275	0	0	290.29	
Potential Emission																	
PM10	5.06	3.38		1.65			45.00			2.81	12.00	1.01	0.68			71.59	
PM (tons/yr)	20.25	13.50		6.60			185.63			11.25	46.88	3.71	2.48			290.29	
Actual Emission																	
PM10	1.49	0.99		1.65			13.26			0.83	10.61	0.30	0.20			29.34	
PM (tons/yr)	5.97	3.98		6.60			54.71			3.32	41.45	0.65	0.73			117.40	

Methodology:

Emission factors are taken from AP-42 of Interim Section 9.9.1 Grain Elevators & Processes

Table 9.9.1-2 shows Interim uncontrolled particulate emission factors for grain elevators

Potential emissions in tons/yr = max "limited" throughput (ton/yr) * emfac (lb/ton) * ton/2000 lbs

*Limited" throughput is 15 MM bushels total through; 5 MM bushels to bean bowl & 2 MM bushels dried.

Effect of Oil Addition (only) as Received

Emfac	Grain Receiving			Grain Drying		Internal Operations				Bin Vents		Bean Bowl		Grain Shipping			Totals
	Truck	Rail	Barge	Column	Rack	Cleaning	Tunnel Belt	Gallery Belt	Headhouse	Bin Vents	In/Out	Truck	Rail	Barge	Ship		
PM10	0.0375	0.0375	0	0.055	0	0	0.2	0	0	0.0125	0.16	0.0075	0.0075	0	0	22.39	
PM (lbs/ton)	0.15	0.15	0	0.22	0	0	0.825	0	0	0.05	0.625	0.0275	0.0275	0	0	90.34	
80.00%	= estimated efficiency of soybean oil addition as received at rate of 1 gal per 1000 bushels received (if used = YES)																
Potential Emission																	
PM10	5.06	3.38		1.65			9.00			0.56	2.40	0.20	0.14			22.39	
PM (tons/yr)	20.25	13.50		6.60			37.13			2.25	9.38	0.74	0.50			90.34	
Actual Emission																	
PM10	1.49	0.99		1.65			2.65			0.17	2.40	0.06	0.04			9.45	
PM (tons/yr)	5.97	3.98		6.60			10.94			0.66	9.38	0.22	0.15			37.89	

Effect of Oil Addition and Emission Controls (Includes Fugitive)

Emfac	Grain Receiving			Grain Drying		Internal Operations				Bin Vents		Bean Bowl		Grain Shipping			Totals
	Truck	Rail	Barge	Column	Rack	Cleaning	Tunnel Belt	Gallery Belt	Headhouse	Bin Vents	In/Out	Truck	Rail	Barge	Ship		
PM10	0.0375	0.0375	0	0.055	0	0	0.2	0	0	0.0125	0.16	0.0075	0.0075	0	0	5.00	
PM (lbs/ton)	0.15	0.15	0	0.22	0	0	0.825	0	0	0.05	0.625	0.0275	0.0275	0	0	19.73	
80.00%	= estimated efficiency of soybean oil addition as received at rate of 1 gal per 1000 bushels received (if used = YES)																
	Overall Emission Control efficiency, if applicable, listed as a percent																
Potential Emission																	
PM10	89.9%	89.9%		99.9%			0.01			99.9%	2.40	0.05	0.03			5.00	
PM (tons/yr)	2.04	1.36		6.60			0.04			0.00	9.38	0.19	0.12			19.73	
Actual Emission																	
PM10	89.9%	89.9%		99.9%			0.00			99.9%	2.40	0.05	0.03			4.19	
PM (tons/yr)	0.60	0.40		6.60			0.01			0.01	9.38	0.19	0.12			17.31	

Example calculation(s):

For Internal Op Potential PM10: Uncontrolled 0.2 lb PM10/ton * 450,000 tons/yr * 1 ton/2000 lb = 45 tons PM10/year
 Oil 0.2 lb PM10/ton * 450,000 tons/yr * 1 ton/2000 lb * (1 - .8 eff) = 9.0 tons PM10/year
 Oil & Control 0.2 lb PM10/ton * 450,000 tons/yr * 1 ton/2000 lb * (1 - .8 eff) * (1 - 0.999eff) = 0.009 tons PM10/year

Emission Unit ID GD
 Grain Dryer Fuel Combustion

Company Name: Central Soya
Address City IN Zip: 1102 West 18th Street
CP:
Plt ID: F097-5485-00008
Reviewer: MC
Date: 04/19/97

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

14.5

127.02

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	140	2.8	35
Potential Emission in tons/yr	0.9	0.9	0.0	8.9	0.2	2.2

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

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

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**CENTRAL SOYA
FEDERAL POTENTIAL to EMIT**

	Point ID	Description	Uncontrolled PM tons/yr	PM Emissions with oil only tons/yr	PM Emissions with oil/control tons/yr	Uncontrolled PM10 tons/yr	PM10 Emissions with oil only tons/yr	PM10 Emissions with oil/control tons/yr	Requested SIP Limit gr/dscf	Exhaust Equipment acfm	PM Requested SIP limit tons/yr	PM10 Requested SIP limit tons/yr	Federal Potential to Emit PM tons/yr	Federal Potential to Emit PM10 tons/yr
SIP	10A (R1)	Elevator No. 1 Truck Receiving System & Basement							0.006	32000	7.23	----	7.23	7.23
SIP	10B (R2)	Elevator No. 2 Truck & Rail Receiving System	33.75	33.75	3.40	8.44	8.44	0.85	0.006	22000	4.95	----	4.95	4.95
SIP	TE (9A)	Tripper Equipment							0.006	4000	0.92	----	0.92	0.92
SIP	LE (9B)	Loader Equipment							0.006	3000	0.7	----	0.70	0.70
SIP	GDCS (9C)	Grain Dryer Conveying System	196.88	39.38	0.04	47.81	9.56	0.01	0.006	4500	1.01	----	1.01	1.01
	GD	Grain Dryer	6.60	6.60	6.60	1.65	1.65	1.65	----	50000	----	----	6.60	1.65
	BBC	Bean Bowl Conveying							----	----	----	----		
	BBL	Bean Bowl Leg							----	----	----	----		
	BBSR	Bean Bowl Storage & Removal	46.88	9.37	9.37	12.00	2.40	2.40	----	----	----	----	9.37	2.40
	EGL	Elevator Grain Loadout	6.19	1.24	0.31	1.69	0.34	0.08	----	----	----	----	1.24	0.34
		Grain Dryer Fuel Combustion	0.90			0.90			----	----	----	----	0.90	0.90
		Sum	291.20	90.34	19.72	72.49	22.39	4.99					32.9	20.1

Totals per facility are calculated per AP-42 Interim Emfacs Table 9.9.1-2 emfacs times dustiness ratio times limited throughput.
Requested SIP limits, in gr/dscf & tons per year, are from Central Soya June 9, 1995 SIP Revision request letter to IDEM-OAM.
Values listed are only valid if requested limited total through is 15 MM bushels through (of that, 5 MM to bean bowl & 2 MM is dried).

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PM Emissions with oil/control in tons/yr are less than PM requested SIP limit for each facility; therefore, appears to be in compliance (if oil/control applied).

Can 0.006 be met & is control equipment needed to PM meet limit?

Receiving: $33.75 \text{ total tons/yr} * 2000 \text{ #/ton} * 7000 \text{ gr/\#} * \text{yr}/8760 \text{ hr} * \text{hr}/60 \text{ min} * \text{min}/22000 \text{ acf} = 0.049 \text{ gr/dscf}$
 $33.75 \text{ total tons/yr} * (1 - 0.899 \text{ control eff}) = 3.40 \text{ tons/yr}$ (assumes even fugitives sent to control equipment w/overall eff of 89.9% (90% * 99.9%))
 $3.4 \text{ tons/yr} * 2000 \text{ #/ton} * 7000 \text{ gr/\#} * \text{yr}/8760 \text{ hr} * \text{hr}/60 \text{ min} * \text{min}/22000 \text{ acf} = 0.004 \text{ gr/dscf}$

Internal: $39.38 \text{ total tons/yr} * 2000 \text{ #/ton} * 7000 \text{ gr/\#} * \text{yr}/8760 \text{ hr} * \text{hr}/60 \text{ min} * \text{min}/11500 \text{ total acf} = 0.091 \text{ gr/dscf}$
 Operations: $39.38 \text{ total tons/yr} * (1 - 0.999 \text{ control eff}) = 0.04 \text{ tons/yr}$
 $0.04 \text{ tons/yr} * 2000 \text{ #/tons} * 7000 \text{ gr/\#} * \text{yr}/8760 \text{ hr} * \text{hr}/60 \text{ min} * \text{min}/3000 \text{ acf} = 0.0004 \text{ gr/dscf}$

Can Process wt rate limit from 326 IAC 6-3-2 be met?

GD $55(45)^{0.11} - 40 = 43.6 \text{ # PM/hr allowable}$
 $0.22 \text{ lb PM/ton emfac} * 45 \text{ tons/hr} = 9.9 \text{ # PM/hr}$

EGLO $55(150)^{0.11} - 40 = 55.4 \text{ # PM/hr allowable}$
 $0.0275 \text{ lb PM/ton emfac} * 150 \text{ tons/hr} = 4.12 \text{ # PM/hr}$

Bean Bowl $55(180)^{0.11} - 40 = 57.4 \text{ # PM/hr allowable}$
 $0.625 \text{ lb PM/ton emfac} * 180 \text{ tons/hr} = 112.5 \text{ # PM/hr} \text{ ***}$
 *** $112.5 * (1 - 0.8 \text{ oil eff}) = 22.5 \text{ # PM/hr}$ MUST USE OIL.

Appendix A: Actual Emissions as Reported in STEPS

Company Name	Central Soya
Address	1102 West 18th Street, Indianapolis, IN 46202
Plant ID	F097-5485-00008
Reviewer	M. Caraher
Date	10/19/98

1996 STEPS 1995 Emission Year

1997 STEPS 1996 Emission Year

Stack	Description	PM	PM10		PM	PM10
1	Vogt Boiler *					
2	Mund Boiler *					
3	Feedmill Ingredient Grinding *	0.50	0.50			
4	Feedmill N. Pellet Cooler *	1.31				
5	Feedmill S. Pellet Cooler *	0.10				
6	Elevator # 1 Truck Rcvng & Basement #	0.01	0.00		0.22	0.06
7	Elevator # 2 Truck & Rail Receiving #	0.03	0.01		0.87	0.23
8	Soy Extraction *					
9	Escher Weiss Dryer *					
10	Berico Grain Dryer				0.63	0.17
11	Elevator Gallery Trippers (2) #	0.12	0.02		0.06	0.01
12	Elevator Gallery Loaders (2) #	0.12	0.02		0.03	0.01
13	Elevator Grain Dryer Conveyance #				0.00	0.00
14	Kaolin Rcvng *					
15	Feedmill Micro Ingredient Rcvng *	4.50	4.50			
16	Murray Gas Boiler *					
17	Soybean Conveying Leg *					
18	Soybean Meal Grinding *					
19	Meal Truck Loadout *					
20	Elevator Grain Loadout	9.97	4.32		0.84	0.23
21	Feedmill Bulk Feed Loadout *	0.69	0.30			
22	Feedmill Bulk Ingredient Receiving *	1.09	0.55			
23	Bean Bowl (Conveying/Storage/Removal)	not given	not given		16.80	5.18
		18.44	10.21		19.45	5.89

* denotes operations shut down or removed

denotes an operation listed in revised 326 IAC 6-1-12

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