Agricor, Inc.
1626 South Joaquin Drive
PO Box 807
Marion IN 46952

Re: Operation Permit Validation FESOP
Permit No. **F053-7235-00052**

Dear Mr. Jack Ewart:

The Office of Air Management (OAM) has received your Affidavit of Construction for the Sifting, Grinding and Aspiration equipment located at 1626 South Joaquin Drive, Marion, Indiana 46952.

You are hereby authorized to operate the facilities as listed in FESOP No. F 053-7235-00052 pursuant to the operation permit conditions therein. This operation permit shall expire on _____ .

This authorization to operate does not terminate, dissolve, or otherwise affect any appeal that may have been filed, or any stay of effectiveness that may have been issued with respect to the FESOP Permit.

Sincerely,

Barry J. Titus, Chief
Permit Administration & Development Section
Office of Air Management

kvr
cc: File - Grant) County
Air Compliance - Jim Thorpe
Permit Tracking - Janet Mobley
Compliance Data - Jerri Curless
Compliance Targeting - Wanda Stanfield
Data Support - Donna Dickison
Data Support - Nancy Landau

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) *ENHANCED NEW SOURCE REVIEW* OFFICE OF AIR MANAGEMENT

Agricor, Inc.
1626 South Joaquin Drive
Marion, Indiana 46952

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

This permit is issued 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.: F053-7235-00052	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	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 presented in the permit application.

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

The Permittee owns and operates a dry corn milling operation with a maximum grain process rate of 12.88 tons per hour or 460 bushels per hour.

Responsible Official:	Jack Ewart
Source Address:	1626 South Joaquin Drive, Marion Indiana
Mailing Address:	P. O. Box 807, Marion, Indiana IN 46952
SIC Code:	2041
County Location:	Grant
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD 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) Receiving pit with a maximum capacity of 156,800 lbs/hr
(2) Four (4) bins to store corn each with a capacity of 560,000 lbs/hr
(3) Precleaning/handling equipment with a max. throughput rate of 25,760 lbs/hr
(4) Cleaning equipment with a max. throughput rate of 25,760 lbs/hr
(5) Milling equipment with a max. throughput rate of 25,760 lbs/hr
(6) Three (3) rotary dryers identified as flour, grits and cones dryers with a combined rate of 25,760 lbs./hr and particulate emissions from each of the dryers controlled by multiple cyclones.
(7) Three (3) coolers identified as flour, grits and cones coolers with a combined rate of 25,760 lbs/hr.
(8) Three (3) bins to store product each with a capacity of 120,000 lbs/hr
(9) Fifteen (15) bins to store product each with a capacity of 50,000 lbs/hr
(10) One (1) bin to store product with a capacity of 20,000 lbs/hr
(11) Loading/shipping equipment with a maximum rate of 25,760 lbs/hr
(12) Three (3) baghouses identified as M-1, M-2 and M-3 controlling particulate emissions from Precleaning and Handling, Cleaning, Milling and Cooling operations..
(13) Three multicyclone systems identified as D-1, D-2 and D-3 controlling particulate emissions from the drying operation.
(14) Sifting equipment with a maximum product rate of 16,016 lbs/hr
(15) Grinding equipment with a maximum product rate of 16,016 lbs/hr
(16) Aspiration equipment with a maximum capacity of 3500 acfm

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) One (1) natural gas fired burner, identified as B1, with a rated capacity of 1.67 mmBtu/hr.
(2) One (1) natural gas fired burner, identified as B2, with a rated capacity of 4.185mmBtu/hr.
(12) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6,000,000) Btu per hour.
(13) Combustion source flame safety purging on startup.
(14) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230, 000 gallons per month.
(15) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
(16) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
(17) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6
(18) The following equipment related to manufacturing activities not resulting in the emissions of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment.
(19) Closed loop heating and cooling systems.
(20) Solvent recycling systems with batch capacity less than equal to 100 gallons.
(21) Blow down for the any of the following: sight glass; boiler; compressors; pumps; and cooling waters.
(22) Farm operations

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) for a Federally Enforceable State Operating Permit (FESOP).

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.

(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.

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)] [326 IAC 2-8-7(a)(3)]

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

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the permittee shall furnish such confidential records directly to the U.S. EPA along with the cliam of confidentiality under 40 CFR 2, subpart B.

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

IDEM, OAM 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 2-5-8(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 conditons 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

(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, 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 continuous or intermittent;

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

(5) Such other facts as specified in Sections D of this permit, IDEM, OAM, 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 (90) days after the issuance of this permit, including the following information on each:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated 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 which will be maintained in inventory for quick replacement.

(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, upon request and shall be subject to review and approval by IDEM, OAM.

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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone 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

Failure to notify IDEM, OAM, 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

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, 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, 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 - Emergency Provision), the probable cause of such deviations, and any corrective actions 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

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

(b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or their substantial equivalent.

(c) 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 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, 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, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM , 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 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).

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

(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 considerd timely if received by IDEM, OAM, on or before the date it is due.[326 IAC 2-5-3]

(2) If IDEM, OAM 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 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, 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 2-8-11whenever 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

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 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

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, 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 ammended by P.L. 244-1997, modification, construction, or reconstruction shall be permitted 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, 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)]

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, 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 ammendmment pursuant to 326 IAC 2-8-10.

(c) IDEM, OAM 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, within thirty (30) calender days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.

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

(c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

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.

B.27 Credible Evidence [326 IAC 2-8-4(3)][62 Federal Resgister 8313][326 IAC 2-8-5]

Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements.

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, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per 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) The Potential To Emit (PTE) of particulate matter (PM) emissions from the entire source shall be limited to less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) do not apply.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21).

(d) 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 forty percent (40%) 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 not withstanding, 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 boundries 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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on Dec. 6, 1996 . The plan consists of:

(a) Wet suppression of dust from unpaved roadways on an as needed basis.

(b) Keeping the truck speed within five (5) miles per hour by posting speed limit sign.

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described nin Section D of this permit.

C.8 Stack Height [326 IAC 1-7]

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

(b) Any changes in the applicable stacks require prior approval from IDEM, OAM.

C.9 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61, Subpart M]

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 must be Indiana accredited is not federally enforceable.

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

C.10 Performance Testing [326 IAC 3-2.1]

(d) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM,OAM.

The test protocol 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

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

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

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

C.11 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

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

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.12 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 actionsshall be initiated whenever indicated.

C.13 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, or 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 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 (±2%) of full scale reading.

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

(b) These ERPs shall be submitted for approval to:

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

within ninety (90) days from the date of issuance of this permit.

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such a plan.

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

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

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance is present in more than the threshold quantity that is subject to 40 CFR 68, 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 part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), 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 that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

C.17 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

(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, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after the 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 the 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 responsive 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 CRP, 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 may be 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.18 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the permittee shall 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 defecient. The permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of defeciency. 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.

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

C.19 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by July 1of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual emission statement 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, on or before the date it is due.

C.20 Monitoring Data Availability

(a) 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) 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 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.21 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

(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 and available within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; 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, part inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the CRP required by Section C - 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.22 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

(a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance 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

(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, 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 must be clearly identified in such reports. A reportable 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 or failure to monitor or record the required compliance monitoring is a deviation.

(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.

Stratospheric Ozone Protection

C.23 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

(1)	Receiving pit with a maximum capacity of 156,800 lbs/hr
(2)	Four (4) bins to store corn, each with a capacity of 560,000 lbs
(3)	Precleaning/handling equipment with a max. throughput rate of 25,760 lbs/hr
(4)	Cleaning equipment with a max. throughput rate of 25,760 lbs/hr
(5)	Milling equipment with a max. throughput rate of 25,760 lbs/hr
(6)	Three (3) rotary dryers identified as flour, grits and cones dryers with a combined rate of 25,760 lbs./hr and particulate emissions from each of the dryers controlled by multiple cyclones.
(7)	Three (3) coolers identified as flour, grits and cones coolers with a combined rate of 25,760 lbs/hr.
(8)	Three (3) bins to store product, each with a capacity of 120,000 lbs
(9)	Fifteen (15) bins to store product, each with a capacity of 50,000 lbs
(10)	One (1) bin to store product with a capacity of 20,000 lbs
(11)	Loading/shipping equipment with a maximum rate of 50,000 lbs/hr
(12)	Three (3) baghouses grouped togather as M-1, two(2) baghouses grouped as M-2 and three(3) baghouses grouped as M-3 controlling particulate emissions from Precleaning and Handling, Cleaning, Milling and Cooling operations respectively.
(13)	Three multicyclone systems identified as D-1, D-2 and D-3 controlling particulate emissions from the drying operation.

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the above listed equipment of the dry corn milling operation shall not exceed 22.7 pounds per hour, a grain process weight rate of 25,760 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

D.1.2 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 operation.

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

D.1.3 Visible Emissions Notations

(a) Daily visible emission notations of all dust collector exhausts, cyclone exhausts and building openings/vents 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 these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.4 Parametric Monitoring for Baghouses M—1, M—2, M—3

The Permittee shall record the total static pressure drop across the baghouses identified as M-1, M-2 and M-3 used in conjunction with the milling operation, at least once weekly when the milling equipment is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 0 and 4.0 inches of water or a range established by its manufacturer. The Compliance Response Plan for these units shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

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

An inspection shall be performed each calender quarter of all bags controlling the milling operation. All defective bags shall be replaced.

D.1.5 Broken Bag or Failure 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. For single compartment baghouses, failed units and the associated process will be shut down immediately untill failed units have been repaired or replaced.

(b) Within eight (8) 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) hours of discovery of the failure and shall include a timetable for completion.

D.1.6 Meal Coolers and Dryers Cyclones D-1, D-2, D-3

(a) Visual inspection to verify that the fans are running shall be performed two (2) times every shift.

(b) Inspection for leaks in ductwork and multicyclone shall be done on weekly basis.

D.1.7 Receiving Pit

(a) Visual inspection by corn grader to verify that bin is used when receiving corn from dump trucks, whenever corn is received from dump trucks.

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

D.1.8 Record Keeping Requirements

(a) To document compliance with Condition D.1.3 the Permittee shall maintain records of daily visible emission notations of all the dust collector exhausts, cyclone exhausts and building openings/vents.

(b) To document compliance with Condition D.1.4, the Permittee shall maintain the ` following:

(1) Daily records of the following operational parameters during normal operation:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure

(2) Documentation of allresponse 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.

(b) Records shall also be kept to demonstrate compliance with condtions D.1.5, D.1.6 and D.1.7.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY CONDITIONS

(a)	Sifting equipment with a maximum product rate of 286 bushels/hr.
(b)	Grinding equipment with a maximum product rate of 286 bushels/hr
(c)	Aspiration equipment with a maximum capacity of 3500 acfm

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

D.2.1 This permit to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

D.2.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

D.2.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) The permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and shall attach it to this permit.

Operation Conditions

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

D.2.6 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the sifting, grinding and aspiration equipment shall not exceed 16.52 pounds per hour when operating at a grain process weight rate of 16,016 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

Compliance Determination Requirements

D.2.7 Testing Requirements [326 IAC 2-8-5(1)]

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

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Agricor, Inc.
Source Address: 1626 Joaquin Drive , Marion , Indiana
Mailing Address: 1626 Joaquin Drive, PO Box 807, Marion, IN 46952
FESOP No.: F053-7235-00052

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 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)

9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, 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

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

Source Name:
Source Address:
Mailing Address:
FESOP No.:

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 Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and CThe Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE REPORT

Source Name:
Source Address:
Mailing Address:
FESOP No.:

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

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the 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 zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (eg. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**	**No Deviations**

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

Source Background And Description

Source Name:	Agricor, Inc.
Source Location:	1626 South Joaquin Drive, Marion, Indiana
County:	Grant
Operation Permit No.:	F053-7235-00052
Permit Reviewer:	Keshav Reddy

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Agricor, Inc. relating to the operation of a dry corn milling operation with maximum grain process rate of 12.88 tons per hour or 460 bushels per hour. There are no permitted emission units at the source during this review.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

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

(1) Receiving pit with a maximum capacity of 156,800 lbs/hr
(2) Four (4) bins to store corn, each with a capacity of 560,000 lbs/hr
(3) Precleaning/handling equipment with a max. throughput rate of 25,760 lbs/hr
(4) Cleaning equipment with a max. throughput rate of 25,760 lbs/hr
(5) Milling equipment with a max. throughput rate of 25,760 lbs/hr
(6) Three (3) rotary dryers identified as flour, grits and cones dryers with a combined rate of 25,760 lbs./hr and particulate emissions from each of the dryers controlled by multiple cyclones.
(7) Three (3) coolers identified as flour, grits and cones coolers with a combined rate of 25,760 lbs/hr.
(8) Three (3) bins to store product, each with a capacity of 120,000 lbs/hr
(9) Fifteen (15) bins to store product, each with a capacity of 50,000 lbs/hr
(10) One (1) bin to store product with a capacity of 20,000 lbs/hr
(11) Loading/shipping equipment with a maximum rate of 25,760 lbs/hr
(12) Three (3) baghouses identified as M-1, M-2 and M-3 controlling particulate emissions from Precleaning and Handling, Cleaning, Milling and Cooling operations..
(13) Three multicyclone systems identified as D-1, D-2 and D-3 controlling particulate emissions from the drying operation.

New Emission Units and Pollution Control Equipment Requiring ENSR

The application also includes information relating to the construction and operation of the following new equipment proposed as a modification. This was submitted by the applicant on July 2, 1997:

(1) Sifting equipment with a maximum product rate of 16,016 bushels/hr.
(2) Grinding equipment with a maximum product rate of 16,016 bushels/hr.
(3) Aspiration equipment with a maximum capacity of 3500 acfm.

Insignificant Activities

The source also includes the following insignificant activities:
(1) One (1) natural gas fired burner, identified as B1, with a rated capacity of 1.67 mmBtu/hr.
(2) One (1) natural gas fired burner, identified as B2, with a rated capacity of 4.185mmBtu/hr.
(3) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6,000,000) Btu per hour.
(4) Combustion source flame safety purging on startup.
(5) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230, 000 gallons per month.
(6) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughout less than 12,000 gallons.
(7) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
(8) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6
(9) The following equipment related to manufacturing activities not resulting in the emissions of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment.
(10) Closed loop heating and cooling systems.
(11) Solvent recycling systems with batch capacity less than equal to 100 gallons.
(12) Blow down for the any of the following: sight glass; boiler; compressors; pumps; and cooling waters.
(13) Farm operations

Enforcement Issue

IDEM is aware that this source has been constructed and operated prior to receipt of the proper permit. IDEM 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 other Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner 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 September 27, 1996. Additional information regarding proposed modification was received on July 2, 1997 . This FESOP review will also satisfy the New Source Review requirements for the existing equipment and also proposed modification.

Potential to Emit (PTE) Calculations

See pages 1 to 7 of the Appendix for detailed calculations on Potential to Emit (PTE) .

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	4788
PM-10	2780
SO_2	0.36
VOC	0.13
CO	0.53
NO_x	2.56

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 (as defined in the Indiana Rule) of Particulate Matter 10 microns (PM-10) 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 Grant County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO_2	attainment
VOC	attainment
CO	attainment
NO_2	attainment

Limited PTE

The source has accepted a federally enforceable limit to keep particulate matter 10-microns (PM-10) emissions less than 99 tons per year.

Process/Facility	PM-10 Emissions
Combustion (Natural Gas)	0.30
Receiving	2.16
Precleaning and Handling	0.042
Cleaning	0.21
Milling	2.41
Drying	2.54
Cooling	0.062
Loading/Shipping	1.11
Sifting	0.0026
Grinding	.0021
Fugitive emissions	11.88
Total emissions (tons/yr)	20.7

The above emissions are calculated based on 8760 hrs/yr of operation of dry corn milling process with all the pollution control equipment operating at all times the dry corn milling process is in operation.

Federal Rule Applicability

(a) This dry corn milling operation is not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR Part 60.300, Subpart DD), because these standards address grain storage elevators with a permanent capacity of one (1) million bushels or grain terminal elevators. Agricor has a permanent storage capacity of 40,000 bushels and is also not a grain terminal elevator.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPS), 40 CFR part 63, applicable to this source.

State Rule Applicability

(a) 326 IAC 2-2
This source's Potential to Emit is limited to less than 100 tons per year. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.2, the PSD requirements do not apply.

(b) 326 IAC 2-8

The source has accepted a federally enforceable limit of 99 tons per year of PM10 emissions to obtain a FESOP and to avoid a Part 70 permit pursuant to 326 IAC 2-7, The source will stay under this limit by operating its pollution control equipment at all times the dry corn milling process is in operation. Stack test for the control efficiency and ideal operational parameters of the control equipment is required to ensure compliance with this is limit.

(c) 326 IAC 2-6

Annual emission reporting requirements of 326 IAC 2-6 are not applicable to this source. This source does not emit or have the potential to emit 100 tons/yr or greater of PM10 emissions, including fugitive emissions, after the FESOP limits are in effect.

(d) 326 IAC 6-3-2

The particulate matter emissions from dry corn milling operation are estimated using
Equation E = 4.1 P ^ 0.67, provided in 326 IAC 6-3-2
Where E = Allowable emission rate in lbs/hr
P = Process weight rate in tons/hr

PM emissions from the milling operation are 5.78 lbs/hr which is less than 22.7 lbs/hr (PM emissions limit for 12.88 tons per hour process rate), hence it meets rule. Stack test for the control efficiency and ideal operational parameters of the control equipment is required to ensure compliance with this is limit

(e) 326 IAC 6-3-2

The particulate matter emissions from the proposed modification (sifting, grinding and aspiration equipment) are also estimated using the
Equation E = 4.1 P ^ 0.67, provided in 326 IAC 6-3-2
Where E = Allowable emission rate in lbs/hr
P = Process weight rate in tons/hr

PM emissions from this modification are 0.01 lbs/hr, if the equipment is operated at maximum capacity with controls for 8760 hrs/yr. This emissions are less than 16.52 lbs/hr (PM emissions limit for 8.008 tons per hour process rate), hence it meets rule.

(f) 326 IAC 6-5

Fugitive particulate matter emissions shall be controlled according to plan submitted by the applicant on December 6, 1996. The plan consists of :

(1) Wet suppression of dust from unpaved roadways on an as needed basis.
(2) Keeping the truck speed within five (5) miles per hour by posting speed limit sign.

Compliance Monitoring

1. The fabric filters on the milling building identified as M1, M2 and M3 have applicable compliance monitoring conditions as specified below:

a) The total static pressure drop across the baghouses must be measured and recorded daily. The pressure drop for the unit shall be maintained within the range of 3.0 and 6.0 inches of water. If the pressure drop is outside this range for more than two consecutive readings, corrective action shall be taken in accordance with the Preventive Maintenance Plan.

b) Daily visible emissions observations at the stacks shall be performed in accordance with 40 CFR 60, Appendix A, Method 9. The observations will be taken in sets of three (3) six-minute readings.

c) Inspection on the external baghouse unit and associated components for evidence of audible leaks, corrosion shall be done on weekly basis.

d) Daily reports concerning conditions a), b) and weekly report concerning condition c) shall be kept for a period of five years and made available to IDEM upon request.

2. The multicyclone collectors on dryers and meal coolers have applicable compliance monitoring conditions as specified below:

a) Visible inspections twice per shift to ensure that fans in the cyclones are running.

b) Daily visible emissions observations at the stacks shall be performed in accordance with 40 CFR 60, Appendix a, Method 9. The observations will be taken in sets of three (3) six-minute readings.

c) Inspection for leaks in ductwork and multicyclone shall be done on weekly basis.

d) Reports concerning conditions a), b) and c) shall be kept for a period of five years and made available to IDEM upon request.

3. The receiving pit has applicable compliance monitoring conditions as specified below:

a) Visual inspection by corn grader to verify that bin is used when receiving corn from dump trucks, whenever corn is received from dump trucks.

b) Daily reports concerning condition a)shall be kept for a period of five years and made available to IDEM upon request.

4 The loading/shipping operations have applicable compliance monitoring condition as specified below:

a) Visual inspection to verify that restrictor plate is intact and that telescoping device is used with each feed truck every time a feed truck is loaded.

b) Daily reports concerning condition a) shall be kept for a period of five years and made available to IDEM upon request.

These compliance monitoring conditions are necessary because the baghouse, multicyclones and other process controls must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 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.

None of these listed air toxics will be emitted from this source.

Conclusion

The operation of this dry corn milling operation will be subject to the conditions of the attached proposed **FESOP No. F053-7235-00052.**

Indiana Department of Environmental Management
Office of Air Management

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

Agricor, Inc.
1626 South Joaquin Drive, Marion IN 46952

F-053-7235, Plt ID-053-00052

On February 13, 1998, the Office of Air Management (OAM) had a notice published in the Marion Chronicle Tribune, Marion, Indiana, stating that Agricor, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate dry corn milling operation with controls. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit 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 permit should be issued as proposed.

On March 9, 1998, Agricor, Inc. submitted comments on the proposed FESOP. The summary of the comments and responses is as follows:

Comment 1: The equipment description in Section D.1 should be changed as follows:
- (a) In item (2) lbs/hr to be changed to lbs
- (b) In item (8) lbs/hr to be changed to lbs
- (c) In item (9) lbs/hr to be changed to lbs
- (d) In item (10) lbs/hr to be changed to lbs
- (e) In item (11), the maximum capacity to be changed from 25,760 lbs/hr to 50,000 lbs/hr
- (f) In item (12), the three baghouses listed as M-1, M-2 and M-3 to be changed as three (3) baghouses grouped together as M-1 serving Precleaning and Handling Operations, two (2) baghouses grouped together as M-2 serving Cleaning area, and three (3) baghouses grouped together as M-3 serving the Milling and Cooling areas.

Response: The Office of Air Management (OAM) acknowledges this request and will make these changes on Section D.1 of the permit. These issues are considered typographic errors in the permit.

Comment 2: Testing requirements of D.1.3 are burdensome for the following reasons:
- (a) This condition implies to test eight dust collectors at the site, which is economically burdensome;
- (b) The dust collectors are exhausted indoor through vents not stacks;
- (c) Use emission estimates as a method to demonstrate compliance;
- (d) Practical difficulties in estimating control efficiencies for each of the dust collectors;

Response: OAM agrees Agricor's request and deleted the stack test requirement at this time. OAM had initially proposed the stack testing condition in the proposed permit on a premise that there were three (3) dust collectors at the source and that the milling operation accounts for more than 40% of the potential emissions. However, there are eight dust collectors controlling the entire process and all are vented inside the building. The final permit includes provisions for visible emission notations, parametric monitoring of control devices, recordkeeping, reporting, good housekeeping practices and a Compliance Response Plan.

Comment 3: Visible emissions Notations - Agricor requests that this condition be clarified to require visible emissions notations once per day of stack exhausts.

Response: OAM agrees to this comment and has changed the language in the permit.

Comment 4: Meal Coolers and Dryers Cyclones - Subparagraph (d) requires Method 9 tests of these exhausts. Agricor believes that visible emission notations required under Condition D.1.4 should be satisfactory for observing equipment opacity, and requests that this requirement be deleted.

Response: OAM has deleted the requirement of Method 9 upon further review. The condition originally stated in the permit was to require Agricor to perform Method 9 visible emissions readings and OAM considers this as a word processing error. Visible emissions notations once a day satisfy the requirements for observing the opacity of dust collectors and other openings.

Comment 5: Recordkeeping requirements - Agricor believes that subparagraph (a) should reference condition D.1.4 (not D.1.3), and that subparagraph (b) should reference D.1.5 (not D.1.4).

Response: IDEM acknowledges these typographic errors and makes the appropriate changes in the permit.

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Agricor, Inc.
1626 South Joaquin Road, PO Box 807
Marion Indiana 46952

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____,I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____ .
(Company Name)

4. I hereby certify that the sifting, grinding and aspiration equipment is constructed in conformity with the requirements and intent of the Construction Permit Application that was submitted on July 02, 1997. These equipment were reviewed as ENSR with F-053-7235-00052. A construction permit application which was submitted on November 02, 1994 was converted into Federally Enforceable State Operating Permit (FESOP) application was issued as **FESOP No. F-053-7235-00052** issued on _____ _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

_____
Signature

_____
Date

STATE OF INDIANA)
)SS
COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 19 _____ .

My Commission expires: _____

_____
Signature

_____
Name (typed or printed)

APPENDIX

EMISSIONS CALCULATIONS

Agricor, Inc. is a dry corn milling operation which produces products known as prime and feed corn. This source has two natural gas fired boilers and feed manufacturing process consisting of the following operations: Receiving; Cleaning; Handling (also includes storage); Milling; Drying; Cooling and Shipping. Emissions from these operations are estimated below.

NATURAL GAS COMBUSTION

Boilers B1 and B2 are fired using natural gas. B1 and B2 have a rated capacity of 1.67 and 4.185 mmBtu/hr respectively. The emission factors for natural gas combustion were taken from AP-42, tables 1.4-1, 1.4-2 and 1.4-3.

Annual natural gas usage rate = (5.855 mmBtu/hr) *(8760 hrs/yr) / (1000 btu/cuft)
= 51.3 mmcuft/yr

	PM	PM10	SO2	NOx	VOC	CO	Lead
lbs/ mmcuft burned	11.9	11.9	0.6	100	5.28	21	-
Pot. Emiss. (Tons/yr)	0.30	0.30	0.36	2.56	0.13	0.53	-

RECEIVING

The grain is unloaded from trucks in the receiving area. The emission factor to estimate particulate matter emissions from receiving is obtained from interim section of AP-42 Table 9.9.1-2. Although grain can be received at a rate of 156,800 lbs/hr, only 25,760 pounds per hour can be milled and 40,000 pounds can be stored. So an effective grain receiving rate of 25,765 lbs/hr is used to estimate emissions.

Uncontrolled PM emissions = Grain receiving rate * emission factor
= 25,765 lbs/hr * 0.15 lbs/ton of grain * ton/2000 lbs
= 1.93 lbs/hr
= 1.93 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 8.46 tons/yr

Uncontrolled PM10 emissions = Grain receiving rate * emission factor
= 25,765 lbs/hr * 0.038 lbs/ton of grain * ton/2000 lbs
= 0.48 lbs/hr
= 0.48 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 2.14 tons/yr

PRECLEANING AND HANDLING

The emission factor to estimate particulate matter emissions from precleaning/handling is obtained from AIRS emission factors listing SCC# 3-02-007-43. Grain handling rate is 460 bu./hr or 25,760 lbs/hr or 12.88 tons/hr. The emissions are exhausted into milling building and captured by a baghouse with an efficiency of 99.9%.

Uncontrolled PM emissions = Grain handling * emission factor
= 12.88 ton/hr * 5.0 lbs/ton of grain
= 64.4 lbs/hr
= 64.4 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 282 tons/yr

Controlled PM emissions = Uncontrolled PM emissions * (1- cont. eff.)
= 64.4 lbs/hr * (1- 99.9%)
= 0.0644 lbs/hr
= 0.28 tons/yr

Uncontrolled PM10 emissions = Grain handling * emission factor
= 12.88 ton/hr * 0.75 lbs/ton of grain
= 9.66 lbs/hr
= 9.66 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 42.3 tons/yr

Controlled PM10 emissions = Uncontrolled PM10 emissions * (1- cont. eff.)
= 9.66 lbs/hr * (1- 99.9%)
= 0.0097 lbs/hr
= 0.042 tons/yr

CLEANING

The emission factor to estimate particulate matter emissions from cleaning operation is obtained from AIRS emission factors listing SCC# 3-02-007-44. Grain cleaning rate is 460 bu./hr or 25,760 lbs/hr or 12.88 tons/hr. The emissions are exhausted into milling building and captured by a baghouse with an efficiency of 99.9%.

Uncontrolled PM emissions = Grain cleaning * emission factor
= 12.88 ton/hr * 6.0 lbs/ton of grain
= 77.28 lbs/hr
= 77.28 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 338 tons/yr

Controlled PM emissions = Uncontrolled PM emissions * (1- cont. eff.)
= 77.28 lbs/hr * (1- 99.9%)
= 0.0772 lbs/hr
= 0.34 tons/yr

Uncontrolled PM10 emissions = Grain cleaning * emission factor
= 12.88 ton/hr * 3.7 lbs/ton of grain
= 47.65 lbs/hr
= 47.65 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 208 tons/yr

Controlled PM10 emissions = Uncontrolled PM10 emissions * (1- cont. eff.)
= 47.65 lbs/hr * (1- 99.9%)
= 0.0476 lbs/hr
= 0.21 tons/yr

Milling

The emission factor for this operation is obtained from wheat and rye milling operations emission factors given in AIRS emission factors listing SCC# 3-02-007-24 and 3-02-007-34. Milling rate is 460 bu./hr or 25,760 lbs/hr or 12.88 tons/hr. The emissions are captured by a baghouse with an efficiency of 99.9%.

Uncontrolled PM emissions = Grain milling * emission factor
= 12.88 ton/hr * 70 lbs/ton of grain
= 901.6 lbs/hr
= 901.6 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 3949 tons/yr

Controlled PM emissions = Uncontrolled PM emissions * (1- cont. eff.)
= 901.6 lbs/hr * (1- 99.9%)
= 0.901 lbs/hr
= 3.94 tons/yr

Uncontrolled PM10 emissions = Grain milling * emission factor
= 12.88 ton/hr * 42.7 lbs/ton of grain
= 550 lbs/hr
= 550 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 2409 tons/yr

Controlled PM10 emissions = Uncontrolled PM10 emissions * (1- cont. eff.)
= 550 lbs/hr * (1- 99.9%)
= 0.55 lbs/hr
= 2.41 tons/yr

Drying

The emission factor for this operation is obtained from drying operation emission factors given in AIRS emission factors listing SCC# 3-02-007-89. Drying of flour, grits, and cones is done at a rate of 460 bu./hr or 25,760 lbs/hr or 12.88 tons/hr. Emissions are controlled by multi cyclones with 95% capture efficiency.

Uncontrolled PM emissions = Product drying * emission factor
= 12.88 ton/hr * 1.5 lbs/ton of grain
= 19.32 lbs/hr
= 19.32 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 84.6 tons/yr

Controlled PM emissions = Uncontrolled PM emissions * (1- cont. eff.)
= 19.32 lbs/hr * (1- 95%)
= 0.966 lbs/hr
= 4.23 tons/yr

Uncontrolled PM10 emissions = Product drying * emission factor
= 12.88 ton/hr * 0.9 lbs/ton of grain
= 11.6 lbs/hr
= 11.6 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 50.7 tons/yr

Controlled PM10 emissions = Uncontrolled PM10 emissions * (1- cont. eff.)
= 11.6 lbs/hr * (1- 95%)
= 0.58 lbs/hr
= 2.54 tons/yr

Cooling

The emission factor for this operation is obtained from soybean milling emission factors given in AIRS emission factors listing SCC# 3-02-007-90. Cooling of flour, grits, and cones is done at a rate of 460 bu./hr or 25,760 lbs/hr or 12.88 tons/hr. Emissions are controlled by cyclone and a baghouse in series with an overall efficiency of 99.9%.

Uncontrolled PM emissions = Product cooling * emission factor
= 12.88 ton/hr * 1.8 lbs/ton of grain
= 23.18 lbs/hr
= 23.18 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 101.5 tons/yr

Controlled PM emissions = Uncontrolled PM emissions * (1- cont. eff.)
= 23.18 lbs/hr * (1- 99.9%)
= 0.02318 lbs/hr
= 0.10 tons/yr

Uncontrolled PM10 emissions = Product cooling * emission factor
= 12.88 ton/hr * 1.1 lbs/ton of grain
= 14.16 lbs/hr
= 14.16 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 62.02 tons/yr

Controlled PM10 emissions = Uncontrolled PM10 emissions * (1- cont. eff.)
= 14.16 lbs/hr * (1- 99.9%)
= 0.01416 lbs/hr
= 0.062 tons/yr

Loading/Shipping

The emission factor for this operation is obtained from soybean milling emission factors given in AIRS emission factors listing SCC# 3-02-007-91. Product is shipped through rail cars and trucks. Emissions are estimated based on a product rate of 460 bu./hr or 25,760 lbs/hr or 12.88 tons/hr.

Uncontrolled PM emissions = Product loading * emission factor
= 12.88 ton/hr * 0.27 lbs/ton of grain
= 3.47 lbs/hr
= 3.47 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 15.23 tons/yr

Controlled PM emissions = Uncontrolled PM emissions * (1- cont. eff.)
= 3.47 lbs/hr * (1- 50%)
= 1.735 lbs/hr
= 7.6 tons/yr

Uncontrolled PM10 emissions = Product loading * emission factor
= 12.88 ton/hr * 0.04 lbs/ton of grain
= 0.51 lbs/hr
= 0.51 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 2.25 tons/yr

Controlled PM10 emissions = Uncontrolled PM10 emissions * (1- cont. eff.)
= 0.51 lbs/hr * (1- 50%)
= 0.255 lbs/hr
= 1.11 tons/yr

Fugitive Emissions From Vehicular Traffic

Fugitive emissions from vehicular traffic is estimated using the equation given below:

Ef = k*5.0*(s/12)* (S/30)*(W/3)^0.7*(w/4)^0.5*((365-p)/365)

where,	Ef	=	Emission factor (lb/mile)
	k	=	0.8 (particle size multiplier)
	s	=	8.9 (% silt content of unpaved roads)
	p	=	125 days of rain greater than or equal to 0.01 inches.
	S	=	5 miles/hr vehicle speed
	W	=	average vehicle weight (36.5 tons)
	w	=	number of wheels on the vehicle (18)

Emissions are estimated from taking a worst case scenario of operation of different kinds of vehicles.

Ef = 0.8 * 5.0 * (8.9/2) * (5/30) * (36.5/3)^0.7 * (18/4)^0.5 * ((365-125)/365)
= 0.8 * 5.0 * 4.45 * 0.167 * 5.75 * 2.12 * 0.657
= 23.8 lbs/mile

Total distance traveled = 0.5 trips/hr * 0.228 miles/trip * 8760 hrs/yr
= 998.64 miles per year

Fugitive emissions = 998.64 miles/yr * 23.8 lbs / mile
from vehicular traffic = 23767.6 lbs/yr * ton/2000 lbs
= **11.88 tons/yr**

MODIFICATION

Agricor, Inc. also proposed to add additional equipment on July 2, 1997. New equipment for sifting, grinding and aspirator are proposed. The new equipment has a product rate of 286 bushels per hour. Emissions for the new addition are also estimated below:

Sifting

The emission factor for this operation is obtained from flaking operation given by AFIA Feed Mill Emission Estimates. A ratio of PM = 2* PM10 is obtained from Table 9.9.1-3 of Interim Edition of AP-42 for grain processing facilities.

Uncontrolled PM emissions = Meal sifting rate * emission factor
= 8.008 ton/hr * 0.15 lbs/ton of grain
= 1.20 lbs/hr
= 1.20 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 5.26 tons/yr

Controlled PM emissions = Uncontrolled PM emissions * (1- cont. eff.)
= 1.20lbs/hr * (1- 99.9%)
= 0.0012 lbs/hr
= 0.005 tons/yr

Uncontrolled PM10 emissions = Meal sifting rate * emission factor
= 8.008 ton/hr * 0.075 lbs/ton of grain
= 0.600 lbs/hr
= 0.6 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 2.63 tons/yr

Controlled PM10 emissions = Uncontrolled PM10 emissions * (1- cont. eff.)
= 0.6 lbs/hr * (1- 99.9%)
= 0.0006 lbs/hr
= 0.002 tons/yr

Grinding

The emission factor for this operation is obtained from hammer milling operation given in Table 9.9.1-3 of Interim Edition of AP-42 for grain processing facilities. A ratio of PM = 2* PM10 is obtained from Table 9.9.1-3 of Interim Edition of AP-42 for grain processing facilities.

Uncontrolled PM emissions = Grinding rate * emission factor
= 8.008 ton/hr * 0.12 lbs/ton of grain
= 0.96 lbs/hr
= 0.96 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 4.20 tons/yr

Controlled PM emissions = Uncontrolled PM emissions * (1- cont. eff.)
= 0.96 lbs/hr * (1- 99.9%)
= 0.0009 lbs/hr
= 0.004 tons/yr

Uncontrolled PM10 emissions = Grinding rate * emission factor
= 8.008 ton/hr * 0.06 lbs/ton of grain
= 0.48 lbs/hr
= 0.48 lbs/hr * ton/2000 lbs * 8760 hrs/yr
= 2.1 tons/yr

Controlled PM10 emissions = Uncontrolled PM10 emissions * (1- cont. eff.)
= 0.48 lbs/hr * (1- 99.9%)
= 0.00048 lbs/hr
= 0.002 tons/yr

Emissions Summary

	PM (tons/yr)	PM10 (tons/yr)	VOC (tons/yr)	S02 (tons/yr)	N0x (tons/yr)	CO (tons/yr)
Uncont. emissions 8760 hrs	4788	2780	0.13	0.36	2.56	0.53
Contr. emissions 8760 hrs	25.2	8.82	0.13	0.36	2.56	0.53

Rule Applicability

326 IAC 6-3-2
Receiving, precleaning/handling, cleaning, milling, drying, cooling, loading and shipping operations can be considered as one process as having a constant process rate of 12.88 tons/hr and PM emissions from this process are verified for this rule.

Allowable PM emissions based on E = 4.1 P^0.67
326 IAC 6-3-2 process wt. Rate = 4.1 (12.88)^0.67
= 22.72 lbs/hr

PM Emissions from the process = 39.7 tons/yr
= 9.06 lbs/hr, which is less than allowable limit, hence satisfies this rule.

326 IAC 6-3-2
Sifting, grinding and aspiration equipment proposed as modifications to the existing plant have a constant process rate of 8.008 tons/hr. PM emissions from this modification are verified for this rule. There are no controls for this equipment and hence PM emissions before controls are equal to PM emissions after controls.

Allowable PM emissions based on E = 4.1 P^0.67
326 IAC 6-3-2 process wt. Rate = 4.1 (8.008)^0.67
= 16.52 lbs/hr

PM Emissions from the modification = 0.01 tons/yr
= 0.002 lbs/hr, which is less than allowable limit, hence satisfies this rule.