

MINOR SOURCE OPERATING PERMIT

**INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**ADM Grain Company
1901 South Sherman Drive
Indianapolis, Indiana 46204**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1 if new source, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-7963-00028	
Issued by: ORIGINALLY SIGNED BY John B. Chavez, Administrator City of Indianapolis Office of Environmental Services	Issuance Date: December 29, 2003 Expiration Date: December 29, 2008

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Malfunction Report**

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary grain elevator.

Authorized Individual: Jeffrey J. Becker
Source Address: 1901 South Sherman Drive, Indianapolis, IN 46204
Mailing Address: 1901 South Sherman Drive, Indianapolis, IN 46204
General Source Phone: (317) 784-2200
SIC Code: 5153
County Location: Marion
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) Two hundred eighteen (218) storage bins, with a combined total capacity of less than twelve (12) million bushels, using no control, and exhausting to the atmosphere. The bins are separated into four (4) groups identified as the "65 House", installed in 1965 and 1966, containing bins identified as 326 through 354, along with 413 through 431, the "77 House", installed in 1977, containing bins identified as 501 through 509, the "57 House", installed in 1957 and 1958, containing bins identified as 31 through 60, 61a, 61b, 62a, 62b, 63, 64, 65a, 65b, 71a, 71b, 72a, 72b, 73a, 73b, 81 through 98, 151 through 186, and 251 through 265, and the "Bean House", containing bins identified as 301 through 324, and 410 through 413.
- (b) One (1) natural gas dryer, installed in 1996, with a maximum heat input of 28 million Btu per hour (MMBtu/hr), and a maximum grain throughput of 75 tons per hour, using no control, and exhausting to the atmosphere.
- (c) Two (2) legs, identified as Dry Leg, and Wet Leg, installed in 1996, serving the dryer, each with a maximum capacity of 224 tons per hour, using no control and exhausting to the atmosphere.
- (d) One (1) twin truck dump, with a maximum capacity of 350 tons per hour, installed in 1965 and 1966, using a baghouse, identified as Baghouse #8, as particulate control, and exhausting to stack 8.
- (e) One (1) rail loadout, identified as South, installed in 1957 and 1958, with maximum capacity of 336 tons per hour, using no control, and exhausting to the atmosphere.

- (f) One (1) rail loadout, identified as North, installed in 1957 and 1958, and upgraded in 1988, with maximum capacity of 1100 tons per hour, using no control, and exhausting to the atmosphere.
- (g) Two (2) rail receiving operations, identified as North and South, installed in 1957 and 1958, each with a maximum capacity of 270 tons per hour, using no control, and exhausting to the atmosphere.
- (h) Internal transfer operations, serving the "65 House", installed in 1965 and 1966, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (i) Fourteen (14) truck loadout spouts, serving the "65 house", installed in 1965 and 1966, with a combined maximum capacity of 270 tons per hour, using no control, and exhausting to the atmosphere.
- (j) Two (2) shipping legs, identified as Leg 7, Leg 8, installed in 1965 and 1966, serving the "65 House", each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (k) One (1) shipping leg, identified as Leg C1, installed in 1977, serving the "65 House", with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (l) Internal transfer operations, serving the "77 House", installed in 1977, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #1, as particulate control, and exhausting to stack 1.
- (m) Internal transfer operations, serving the "57 House", installed in 1957 and 1958, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (n) Five (5) shipping legs, installed in 1957 and 1958, serving the "57 House", identified as Legs 1 through 5, each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (o) One (1) shipping legs, installed in 1977, serving the "57 House", identified as F1 Jack Leg, with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (p) Unpaved and paved roads with public access.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate 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.

B.2 Definitions

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

B.3 Effective Date of the Permit [IC13-15-5-3]

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

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit 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).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to IDEM, OAQ, and OES stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES.

IDEM, OAQ, and OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]
[IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [Indianapolis Code of Ordinances]

- (a) The Permittee shall pay annual fees to City of Indianapolis, OES within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call Joyce Jackson at (317) 327-2234 for more information.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Fugitive Dust Emissions [326 IAC 6-4]

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

C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary,

including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Enforcement
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

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

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

Testing Requirements

C.5 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ, and OES.

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

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.6 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements

C.7 Compliance Monitoring [326 IAC 2-1.1-11]

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

C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.9 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a (*temperature or flow rate*), the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.10 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ, and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan, the Permittee shall amend its

Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ, and OES shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and 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 a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

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

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

C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

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

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

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Compliance
2700 South Belmont Avenue

Indianapolis, Indiana 46221

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) Unless otherwise specified in this permit, any reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description : One (1) natural gas dryer, installed in 1996, with a maximum heat input of 28 million Btu per hour (MMBtu/hr), and a maximum grain throughput of 75 tons per hour, using no control, and exhausting to the atmosphere.

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

Emission Limitations and Standards

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the affected facilities described in this section except when otherwise specified in 40 CFR 60 , Subpart DD.

D.1.2 Particulate Matter (PM) [326 IAC 12][40 CFR 60.302, Subpart DD]

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300 to 60.304, Subpart DD), the affected facilities shall comply with the following:

- (a) No owner or operator subject to the provisions of this subpart shall cause to be discharged in to the atmosphere any gases which exhibit greater than 0 percent opacity from any:
 - (1) Column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch).
 - (2) Rack dryer in which exhaust gases pass through a screen filter coarser than 50 mesh.
- (b) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:
 - (1) Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf). This emissions limitation is equivalent to the following emission rates:
 - (A) 3.69 pounds per hour from the rail loadout, identified as North. Through the use of a baghouse, the rail loadout, identified as North is in compliance with this rule
 - (B) 3.43 pounds per hour each from the Wet Leg and the Dry Leg. Through the use of a baghouse, the Wet Leg and the Dry Leg are in compliance with this rule.

The source complies with this rule through the use of baghouses, as shown in Appendix A of the Technical Support Document (TSD), page 5.

- (2) Exhibits greater than 0 percent opacity.
- (c) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from:

- (1) Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.
- (2) Any grain handling operation which exhibits greater than 0 percent opacity.
- (3) Any truck loading station which exhibits greater than 10 percent opacity.
- (4) Any barge or ship loading station which exhibits greater than 20 percent opacity.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description :

- (a) One (1) twin truck dump, with a maximum capacity of 350 tons per hour, installed in 1965 and 1966, using a baghouse, identified as Baghouse #8, as particulate control, and exhausting to stack 8.
- (b) One (1) rail loadout, identified as South, installed in 1957 and 1958, with maximum capacity of 336 tons per hour, using no control, and exhausting to the atmosphere.
- (c) One (1) rail loadout, identified as North, installed in 1957 and 1958, and upgraded in 1988, with maximum capacity of 1100 tons per hour, using no control, and exhausting to the atmosphere.
- (d) Two (2) rail receiving operations, identified as North and South, installed in 1957 and 1958, each with a maximum capacity of 270 tons per hour, using no control, and exhausting to the atmosphere.
- (e) Internal transfer operations, serving the "65 House", installed in 1965 and 1966, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (f) Fourteen (14) truck loadout spouts, serving the "65 house", installed in 1965 and 1966, with a combined maximum capacity of 270 tons per hour, using no control, and exhausting to the atmosphere.
- (g) Two (2) shipping legs, identified as Leg 7, Leg 8, installed in 1965 and 1966, serving the "6 House", each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (h) One (1) shipping leg, identified as Leg C1, installed in 1977, serving the "65 House", with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (i) Internal transfer operations, serving the "77 House", installed in 1977, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #1, as particulate control, and exhausting to stack 1.
- (j) Internal transfer operations, serving the "57 House", installed in 1957 and 1958, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (k) Five (5) shipping legs, installed in 1957 and 1958, serving the "57 House", identified as Legs 1 through 5, each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (l) One (1) shipping legs, installed in 1977, serving the "57 House", identified as F1 Jack Leg, with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.

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

Emission Limitations and Standards

D.2.1 Particulate Emission Limitations [326 IAC 6-1-2]

- (a) Pursuant to this rule, grain elevators shall be limited to particulate matter emissions of no greater than three-hundredths (0.03) grain per dscf. This emissions limitation is equivalent to the following emission rates:

Emissions Unit	Allowable Particulate Emissions (lb/hr)
Truck Dump	7.71
North rail loadout	11.06
South rail loadout	11.06
North rail receiving	4.11
South rail receiving	4.11
"65" internal transfer	10.29
Truck Loadouts	10.29
Leg 7	10.29
Leg 8	10.29
Leg C1	10.29
"77" internal transfer	6.17
"57" internal transfer	11.06
Leg 1	11.06
Leg 2	11.06
Leg 3	11.06
Leg 4	11.06
Leg 5	11.06
"57" shipping leg	11.06

- (b) Pursuant to this rule, all grain elevators shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

- (1) Housekeeping practices shall be conducted as follows:
 - (A) Areas to be swept and maintained shall include at a minimum:
 - (i) general grounds, yard, and other open areas;

- (ii) floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations; and;
 - (iii) grain driers with respect to accumulated particulate matter.
 - (B) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (C) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
- (2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
- (A) Malfunctions.
 - (B) Breakdowns.
 - (C) Improper adjustment.
 - (D) Operating above the rated or designed capacity.
 - (E) Not following designed operating specifications.
 - (F) Lack of good preventive maintenance care.
 - (G) Lack of critical and proper spare replacement parts on hand.
 - (H) Lack of properly trained and experienced personnel.
- (3) Emissions from the affected areas, operations equipment, and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

Compliance Determination Requirements

D.2.2 Particulate Control

In order to comply with D.2.1, the baghouses, identified as Baghouse #1, Baghouse #6, Baghouse #7, and Baghouse #8, for particulate control shall be in operation and control emissions from the affected facilities at all times these facilities are in operation.

Compliance Monitoring Requirements

D.2.3 Visible Emissions Notations

- (a) Visible emission notations of the stack exhausts for as Baghouse #1, Baghouse #6, Baghouse #7, and Baghouse #8 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for

that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

D.2.4 Parametric Monitoring

The Permittee shall record the total static pressure drop across Baghouse #1, Baghouse #6, Baghouse #7, and Baghouse #8 used in conjunction with the affected facilities, at least once per shift when the affected facilities are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

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

D.2.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the affected facilities when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been

repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of visible emission notations of the stack exhausts for Baghouse #1, Baghouse #6, Baghouse #7, and Baghouse #8 once per shift.
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description : Two (2) legs, identified as Dry Leg, and Wet Leg, installed in 1996, serving the dryer, each with a maximum capacity of 224 tons per hour, using no control, and exhausting to the atmosphere.

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

Emission Limitations and Standards

D.3.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the affected facilities described in this section except when otherwise specified in 40 CFR 60 , Subpart DD.

D.3.2 Particulate Matter (PM) [326 IAC 12][40 CFR 60.302, Subpart DD]

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300 to 60.304, Subpart DD), the affected facilities shall comply with the following:

- (a) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any gases which exhibit greater than 0 percent opacity from any:
 - (1) Column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch).
 - (1) Rack dryer in which exhaust gases pass through a screen filter coarser than 50 mesh.
- (b) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:
 - (1) Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf). This emissions limitation is equivalent to the following emission rates 3.43 pounds per hour each from the Wet Leg and the Dry Leg.
 - (2) Exhibits greater than 0 percent opacity.
- (c) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from:
 - (2) Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.
 - (3) Any grain handling operation which exhibits greater than 0 percent opacity.
 - (4) Any truck loading station which exhibits greater than 10 percent opacity.
 - (5) Any barge or ship loading station which exhibits greater than 20 percent opacity.

D.3.3 Particulate Emission Limitations [326 IAC 6-1-2]

Pursuant to this rule, all grain elevators shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

- (a) Housekeeping practices shall be conducted as follows:
 - (1) Areas to be swept and maintained shall include at a minimum:
 - (A) general grounds, yard, and other open areas;
 - (B) floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations; and;
 - (C) grain driers with respect to accumulated particulate matter.
 - (2) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (3) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (4) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

- (b) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (1) Malfunctions.
 - (2) Breakdowns.
 - (3) Improper adjustment.
 - (4) Operating above the rated or designed capacity.
 - (5) Not following designed operating specifications.
 - (6) Lack of good preventive maintenance care.
 - (7) Lack of critical and proper spare replacement parts on hand.
 - (8) Lack of properly trained and experienced personnel.

- (c) Emissions from the affected areas, operations equipment, and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
and
OFFICE OF ENVIRONMENTAL SERVICES**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	ADM Grain Company
Address:	1901 South Sherman Drive
City:	Indianapolis, Indiana 46204
Phone #:	(317) 784-2200
MSOP #:	097-7963-00028

I hereby certify that ADM Grain Company is still in operation.
 no longer in operation.

I hereby certify that ADM Grain Company is in compliance with the requirements of MSOP 097-7963-00028.
 not in compliance with the requirements of MSOP 097-7963-00028.

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

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

Noncompliance:

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

PAGE 1 OF 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

Addendum to the
Technical Support Document for a Minor Source Operating Permit

Source Name: ADM Grain Company
Source Location: 1901 South Sherman Drive, Indianapolis, IN 46204
County: Marion
SIC Code: 5153
Operation Permit No.: 097-7963-00028
Permit Reviewer: Angelique Oliger

On October 25, 2003, the Office of Air Quality (OAQ) and Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that ADM Grain Company had applied for a Minor Source Operating Permit for the operation of grain elevator. The notice also stated that OAQ and OES 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.

The following changes, to the draft MSOP, will be made. The TSD will remain as it originally appeared when published. These changes have no effect on the limited potential to emit (PTE) for this source. OES and OAQ prefer that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Upon further review, the OAQ and OES have decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Section A.1 (General Information) has been revised to correct the spelling of the name of the authorized individual.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]
The Permittee owns and operates a stationary grain elevator.

Authorized Individual: Jeffrey J. ~~Backer~~ **Becker**
Source Address: 1901 South Sherman Drive, Indianapolis, IN 46204
Mailing Address: 1901 South Sherman Drive, Indianapolis, IN 46204
General Source Phone: (317) 784-2200
SIC Code: 5153
County Location: Marion
Source Location Status: Attainment for all criteria pollutants

Source Status: Minor Source Operating Permit
Minor Source, under PSD
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

2. Section A.2 (Source Summary) has been revised to correct the maximum heat input of the natural gas dryer.

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) Two hundred eighteen (218) storage bins, with a combined total capacity of less than twelve (12) million bushels, using no control, and exhausting to the atmosphere. The bins are separated into four (4) groups identified as the "65 House", installed in 1965 and 1966, containing bins identified as 326 through 354, along with 413 through 431, the "77 House", installed in 1977, containing bins identified as 501 through 509, the "57 House", installed in 1957 and 1958, containing bins identified as 31 through 60, 61a, 61b, 62a, 62b, 63, 64, 65a, 65b, 71a, 71b, 72a, 72b, 73a, 73b, 81 through 98, 151 through 186, and 251 through 265, and the "Bean House", containing bins identified as 301 through 324, and 410 through 413.
- (b) One (1) natural gas dryer, installed in 1996, with a maximum heat input of ~~48~~ **28** million Btu per hour (MMBtu/hr), and a maximum grain throughput of 75 tons per hour, using no control, and exhausting to the atmosphere.
3. Section A.2 (Source Summary) has been revised to correct the description, control, and stack information on several units that do not use baghouses for control and do not exhaust to a stacks.
- (c) Two (2) ~~shipping~~ legs, identified as Dry Leg, and Wet Leg, installed in 1996, serving the dryer, each with a maximum capacity of 224 tons per hour, ~~using a baghouse, identified as Baghouse #6, as particulate control,~~ **using no control**, and exhausting to ~~stack 6~~ **the atmosphere**.
- (d) One (1) twin truck dump, with a maximum capacity of 350 tons per hour, installed in 1965 and 1966, using a baghouse, identified as Baghouse #8, as particulate control, and exhausting to stack 8.
- (e) One (1) rail loadout, identified as South, installed in 1957 and 1958, with maximum capacity of 336 tons per hour, ~~using a baghouse, identified as Baghouse #7, as particulate control,~~ **using no control**, and exhausting to ~~stack 7~~ **the atmosphere**.
- (f) One (1) rail loadout, identified as North, installed in 1957 and 1958, and upgraded in 1988, with maximum capacity of 1100 tons per hour, ~~using a baghouse, identified as Baghouse #7, as particulate control,~~ **using no control**, and exhausting to ~~stack 7~~ **the atmosphere**.
- (g) Two (2) rail receiving operations, identified as North and South, installed in 1957 and 1958, each with a maximum capacity of 270 tons per hour, ~~using a baghouse, identified as Baghouse #5,~~ **using no control**, and exhausting to ~~stack 5~~ **the atmosphere**.

- (h) Internal transfer operations, serving the "65 House", installed in 1965 and 1966, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
 - (i) Fourteen (14) truck loadout spouts, serving the "65 house", installed in 1965 and 1966, with a combined maximum capacity of 270 tons per hour, ~~using a baghouse, identified as Baghouse #5,~~ **using no control**, and exhausting to ~~stack 5~~ **the atmosphere**.
4. Section D.1 Facility Description has been modified to correct the maximum heat input of the natural gas dryer.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description : One (1) natural gas dryer, installed in 1996, with a maximum heat input of ~~48~~ **28** million Btu per hour (MMBtu/hr), and a maximum grain throughput of 75 tons per hour, using no control, and exhausting to the atmosphere.

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

5. Section D.2 Facility Descriptions (b) through (d) and (f) have been modified to reflect the description, control and stack information on several units that do not use baghouses for control and do not exhaust to a stacks.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description :

- (a) One (1) twin truck dump, with a maximum capacity of 350 tons per hour, installed in 1965 and 1966, using a baghouse, identified as Baghouse #8, as particulate control, and exhausting to stack 8.
- (b) One (1) rail loadout, identified as South, installed in 1957 and 1958, with maximum capacity of 336 tons per hour, ~~using a baghouse, identified as Baghouse #7, as particulate control,~~ **using no control**, and exhausting to ~~stack 7~~ **the atmosphere**.
- (c) One (1) rail loadout, identified as North, installed in 1957 and 1958, and upgraded in 1988, with maximum capacity of 1100 tons per hour, ~~using a baghouse, identified as Baghouse #7, as particulate control,~~ **using no control**, and exhausting to ~~stack 7~~ **the atmosphere**.
- (d) Two (2) rail receiving operations, identified as North and South, installed in 1957 and 1958, each with a maximum capacity of 270 tons per hour, ~~using a baghouse, identified as Baghouse #5,~~ **using no control**, and exhausting to ~~stack 5~~ **the atmosphere**.
- (e) Internal transfer operations, serving the "65 House", installed in 1965 and 1966, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (f) Fourteen (14) truck loadout spouts, serving the "65 house", installed in 1965 and 1966, with a combined maximum capacity of 270 tons per hour, ~~using a baghouse, identified as Baghouse #5,~~ **using no control**, and exhausting to ~~stack 5~~ **the atmosphere**.

6. Sections D.2.2, D.2.3, D.2.4, and D.2.7 have been revised to remove the reference to Baghouse #5.

D.2.2 Particulate Control

In order to comply with D.2.1, the baghouses, identified as Baghouse #1, ~~Baghouse #5,~~ Baghouse #6, Baghouse #7, and Baghouse #8, for particulate control shall be in operation and control emissions from the affected facilities at all times these facilities are in operation.

Compliance Monitoring Requirements

D.2.3 Visible Emissions Notations

- (a) Visible emission notations of the stack exhausts for as Baghouse #1, ~~Baghouse #5,~~ Baghouse #6, Baghouse #7, and Baghouse #8 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of

the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

D.2.4 Parametric Monitoring

The Permittee shall record the total static pressure drop across Baghouse #1, ~~Baghouse #5,~~ Baghouse #6, Baghouse #7, and Baghouse #8 used in conjunction with the affected facilities, at least once per shift when the affected facilities are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

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

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.7 Record Keeping Requirements

-
- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of visible emission notations of the stack exhausts for Baghouse #1, ~~Baghouse #5,~~ Baghouse #6, Baghouse #7, and Baghouse #8 once per shift.
 - (g) To document compliance with Condition D.2.4, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
 - (h) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.
 - (i) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
7. Section D.3 Facility Description has been modified to correct the description, control, and stack information for the legs, identified as Dry Leg and Wet Leg.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description : Two (2) ~~shipping~~ legs, identified as Dry Leg, and Wet Leg, installed in 1996, serving the dryer, each with a maximum capacity of 224 tons per hour, ~~using a baghouse, identified as Baghouse #6, as particulate control,~~ **using no control**, and exhausting to ~~stack 6~~ **the atmosphere**.

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

8. Section D.3.2 (b)(1)(A) has been removed because 40 CFR 60.302 Subpart DD does not apply to the North Rail Loadout as discussed on page 6 of the TSD. Furthermore, This equipment is not relevant to the Dry Leg and Wet Leg for which Section D.3 is written.

D.3.2 Particulate Matter (PM) [326 IAC 12][40 CFR 60.302, Subpart DD]

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300 to 60.304, Subpart DD), the affected facilities shall comply with the following:

- (a) No owner or operator subject to the provisions of this subpart shall cause to be discharged in to the atmosphere any gases which exhibit greater than 0 percent opacity from any:
 - (1) Column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch).
 - (2) Rack dryer in which exhaust gases pass through a screen filter coarser than 50 mesh.
- (b) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission

which:

(1) Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf). This emissions limitation is equivalent to ~~the following emission rates:~~

~~(A) 3.69 pounds per hour from the rail loadout, identified as North. Through the use of a baghouse, the rail loadout, identified as North is in compliance with this rule~~

~~(B) 3.43 pounds per hour each from the Wet Leg and the Dry Leg. Through the use of a baghouse, the Wet Leg and the Dry Leg are in compliance with this rule.~~

~~The source complies with this rule through the use of baghouses, as shown in Appendix A of the Technical Support Document (TSD), page 5.~~

(2) Exhibits greater than 0 percent opacity.

(c) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from:

(1) Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.

(2) Any grain handling operation which exhibits greater than 0 percent opacity.

(3) Any truck loading station which exhibits greater than 10 percent opacity.

(4) Any barge or ship loading station which exhibits greater than 20 percent opacity.

9. Sections D.3.4 through D.3.9 have been removed because the legs, identified as Dry Leg and Wet Leg, do not use a baghouse.

Compliance Determination Requirements

~~D.3.4 Particulate Control~~

~~In order to comply with condition D.3.3, the baghouse, identified as Baghouse #6, for particulate control shall be in operation and control emissions from the two (2) shipping legs, identified as Dry Leg, and Wet Leg, at all times that these facilities are in operation.~~

Compliance Monitoring Requirements

~~D.3.5 Visible Emissions Notations~~

~~(a) Visible emission notations of the stack exhausts for Baghouse #6 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not~~

~~counting startup or shut down time.~~

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

D.3.6 Parametric Monitoring

~~The Permittee shall record the total static pressure drop across Baghouse #6 used in conjunction with the two (2) shipping legs, identified as Dry Leg, and Wet Leg, at least once per shift when the two (2) shipping legs, identified as Dry Leg, and Wet Leg are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.~~

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

D.3.7 Baghouse Inspections

~~An inspection shall be performed each calendar quarter of all bags controlling the two (2) shipping legs, identified as Dry Leg, and Wet Leg, when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.~~

D.3.8 Broken or Failed Bag Detection

~~In the event that bag failure has been observed:~~

- ~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the~~

~~failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

- ~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

Record Keeping and Reporting Requirements ~~[326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]~~

~~D.3.9 Record Keeping Requirements~~

-
- ~~(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emission notations of the stack exhaust for Baghouse #6 once per shift.~~
- ~~(b) To document compliance with Condition D.3.6, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.~~
- ~~(c) To document compliance with Condition D.3.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.~~
- ~~(d) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.~~

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

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

Source Background and Description

Source Name: ADM Grain Company
Source Location: 1901 South Sherman Drive, Indianapolis, IN 46204
County: Marion
SIC Code: 5153
Operation Permit No.: 097-7963-00028
Permit Reviewer: Angelique Oliger

The Office of Environmental Services (OES) has reviewed an application from ADM Grain Company relating to the operation of grain elevator.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Two hundred eighteen (218) storage bins, with a combined total capacity of less than twelve (12) million bushels, using no control, and exhausting to the atmosphere. The bins are separated into four (4) groups identified as the "65 House", installed in 1965 and 1966, containing bins identified as 326 through 354, along with 413 through 431, the "77 House", installed in 1977, containing bins identified as 501 through 509, the "57 House", installed in 1957 and 1958, containing bins identified as 31 through 60, 61a, 61b, 62a, 62b, 63, 64, 65a, 65b, 71a, 71b, 72a, 72b, 73a, 73b, 81 through 98, 151 through 186, and 251 through 265, and the "Bean House", containing bins identified as 301 through 324, and 410 through 413.
- (b) One (1) natural gas dryer, installed in 1996, with a maximum heat input of 18 million Btu per hour (MMBtu/hr), and a maximum grain throughput of 75 tons per hour, using no control, and exhausting to the atmosphere.
- (c) Two (2) shipping legs, identified as Dry Leg, and Wet Leg, installed in 1996, serving the dryer, each with a maximum capacity of 224 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (d) One (1) twin truck dump, with a maximum capacity of 350 tons per hour, installed in 1965 and 1966, using a baghouse, identified as Baghouse #8, as particulate control, and exhausting to stack 8.
- (e) One (1) rail loadout, identified as South, installed in 1957 and 1958, with maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #7, as particulate

control, and exhausting to stack 7.

- (f) One (1) rail loadout, identified as North, installed in 1957 and 1958, and upgraded in 1988, with maximum capacity of 1100 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (g) Two (2) rail receiving operations, identified as North and South, installed in 1957 and 1958, each with a maximum capacity of 270 tons per hour, using a baghouse, identified as Baghouse #5, and exhausting to stack 5.
- (h) Internal transfer operations, serving the "65 House", installed in 1965 and 1966, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (i) Fourteen (14) truck loadout sprouts, serving the "65 house", installed in 1965 and 1966, with a combined maximum capacity of 270 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (j) Two (2) shipping legs, identified as Leg 7, Leg 8, installed in 1965 and 1966, serving the "65 House", each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (k) One (1) shipping leg, identified as Leg C1, installed in 1977, serving the "65 House", with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #6, as particulate control, and exhausting to stack 6.
- (l) Internal transfer operations, serving the "77 House", installed in 1977, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #1, as particulate control, and exhausting to stack 1.
- (m) Internal transfer operations, serving the "57 House", installed in 1957 and 1958, with a maximum capacity of 336 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (n) Five (5) shipping legs, installed in 1957 and 1958, serving the "57 House", identified as Legs 1 through 5, each with a maximum capacity of 476 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (o) One (1) shipping legs, installed in 1977, serving the "57 House", identified as F1 Jack Leg, with a maximum capacity of 840 tons per hour, using a baghouse, identified as Baghouse #7, as particulate control, and exhausting to stack 7.
- (p) Unpaved and paved roads with public access.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP-960028-01, issued on December 16, 1996; and

(b) OP0028-001 through 0028-018, issued on December 31, 1991.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Length x Width or Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
1	77 House	24	8 x 2	24,000	ambient
5	Rail Receiving	27	2.4 x 1.8	16,000	ambient
6	65 House	13.5	3.5	40,000	ambient
7	57 House	30	3.3 x 2.4	43,000	ambient
8	Truck receiving	33.5		30,000	ambient

Recommendation

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

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

An application for the purposes of this review was received on December 13, 1996, with additional information received on September 10, 2003.

Emission Calculations

See Appendix A (five pages) of this document for detailed emissions calculations.

Potential To Emit Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	225.77
PM-10	72.90
SO ₂	0.05
VOC	0.43
CO	6.60
NO _x	7.86
Single HAP	negligible

Combination of HAPs	negligible
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- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	225.77
PM10	72.90
SO ₂	0.05
VOC	0.43
CO	6.60
NO _x	7.86
Single HAP	negligible
Combination of HAPs	negligible

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) These emissions are based on the information provided in the source's operating permit application.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit M-097-7963-00028, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OES inspector assigned to the source.

Federal Rule Applicability

- (a) The natural gas grain dryer, the Wet Leg, and the Dry Leg are subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR § 60.300, Subpart DD), because these facilities were installed or modified at a grain terminal elevator with a permanent storage capacity of more than 2.5 million U.S. bushels that is not located at animal food manufacturer, pet food manufacturer, cereal manufacturer, brewery, or livestock feedlot, after August 3, 1978, and these facilities are included in the affected facilities listed in 40 CFR §60.300(a). Pursuant to this rule:
 - (1) No owner or operator subject to the provisions of this subpart shall cause to be discharged in to the atmosphere any gases which exhibit greater than 0 percent opacity from any:
 - (A) Column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch).
 - (B) Rack dryer in which exhaust gases pass through a screen filter coarser than 50 mesh.

- (2) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:
 - (A) Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf).
 - (B) Exhibits greater than 0 percent opacity.
- (3) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any fugitive emission from:
 - (A) Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity.
 - (B) Any grain handling operation which exhibits greater than 0 percent opacity.
 - (C) Any truck loading station which exhibits greater than 10 percent opacity.
 - (D) Any barge or ship loading station which exhibits greater than 20 percent opacity.
- (b) Although the rail loadout, identified as North, was modified at such a grain terminal elevator after August 3, 1978, this rule does not apply, because, pursuant to 40 CFR §60.304(b)(1), this rule does not apply to the addition of gravity loadout spouts to existing grain storage or grain transfer bins.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-7 (Stack Height Provisions)

This source is not subject to the requirements of this rule because each stack has actual particulate matter emissions after control of less than 25 tons per year.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

This source is not a major source. This source not one (1) of the twenty-eight (28) listed source categories. The potential to emit each criteria pollutant from the entire source is less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) are not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This source will emit less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs, and construction occurred before July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit less than ten (10) tons per year of NO_x and/or VOC in Marion County and less than one hundred (100) tons per year of Particulate Matter (PM-10). In addition, the potential to emit HAPs is less than any major source threshold and, as such, is not required to obtain a permit under 326 IAC 2-7 (Part 70 Permit Program). As a result, 326 IAC 2-6 (Emission Reporting) does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Particulate Emission Limitations)

- (a) Pursuant to 6-1-1(c), the natural gas grain dryer is not subject to this rule because the more stringent limitations set by 326 IAC 12, New Source Performance Standard (NSPS), 40 CFR 60.300 through 60.304, Subpart DD, apply, as shown on page 5 of Appendix A.
- (b) 326 IAC 6-1-2 applies to the Wet Leg, the Dry Leg, the twin truck dump, the South rail loadout, the North rail loadout, the North and South rail receiving operations, the internal transfer operations, serving the "65 House", the truck loadout sprouts, Leg 7, Leg 8, Leg C1, internal transfer operations, serving the "77 House", internal transfer operations, serving the "57 House", five (5) shipping legs, serving the "57 House", and one (1) shipping leg, serving the "57 House" because the source is not specifically listed in Section 8.1 through 18 of this rule, but has the potential to emit one hundred (100) tons or more of particulate matter per year.
 - (1) 326 IAC 6-1-2(d)(1) applies to the twin truck dump, the South rail loadout, the North rail loadout, the North and South rail receiving operations, the internal transfer operations, serving the "65 House", the truck loadout sprouts, Leg 7, Leg 8, internal transfer operations, serving the "57 House", and five (5) shipping legs, serving the "57 House" because construction or modification began prior to January 13, 1977, and they are located at a grain terminal elevator that has a permanent storage capacity of two million five hundred thousand (2,500,000) U.S. bushels. Pursuant to this rule, grain elevators shall be limited to particulate matter emissions of no greater than three-hundredths (0.03) grain per dscf. The source complies with this rule through the use of baghouses as shown in Appendix A, page 5.
 - (2) 326 IAC 6-1-2(a) applies to the Wet Leg, the Dry Leg, Leg C1, internal transfer operations, serving the "77 House", and one (1) shipping leg, serving the "57 House" because these facilities were constructed after January 13, 1977. Pursuant to this rule, grain elevators shall be limited to particulate matter emissions of no greater than three-hundredths (0.03) grain per dscf. The source complies with this rule through the use of baghouses as shown in Appendix A, page 5.
 - (3) 326 IAC 6-1-2(d)(2) applies to the Wet Leg, the Dry Leg, the twin truck dump, the South rail loadout, the North rail loadout, the North and South rail receiving operations, the internal transfer operations, serving the "65 House", the truck loadout sprouts, Leg 7, Leg 8, Leg C1, internal transfer operations, serving the "77 House", internal transfer operations, serving the "57 House", five (5) shipping legs,

serving the "57 House", and one (1) shipping leg, serving the "57 House". Pursuant to this rule, all grain elevators shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

- (A) Housekeeping practices shall be conducted as follows:
 - (i) Areas to be swept and maintained shall include at a minimum:
 - (AA) general grounds, yard, and other open areas;
 - (BB) floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations; and;
 - (CC) grain driers with respect to accumulated particulate matter.
 - (ii) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (iii) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (iv) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

- (B) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (i) Malfunctions.
 - (ii) Breakdowns.
 - (iii) Improper adjustment.
 - (iv) Operating above the rated or designed capacity.
 - (v) Not following designed operating specifications.
 - (vi) Lack of good preventive maintenance care.
 - (vii) Lack of critical and proper spare replacement parts on hand.
 - (viii) Lack of properly trained and experienced personnel.

- (C) Emissions from the affected areas, operations equipment, and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

Conclusion

The operation of this country grain elevator shall be subject to the conditions of the attached proposed Minor Source Operating Permit 097-7963-00028.